



Office of Enforcement and Compliance Assurance

The Clean Air Act Stationary Source Compliance Monitoring Strategy

AIRS/AFS Technical Support Document

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INTRODUCTION

In April 2001, the United States Environmental Protection Agency (EPA) issued the revised Clean Air Act Stationary Source Compliance Monitoring Strategy (CMS). The revised CMS was developed by EPA in conjunction with representatives from the State and Territorial Air Program Administrators/Association of Local Air Pollution Control Officials (STAPPA/ALAPCO). CMS is the Agency's national policy which forms the basis for planning, implementing and evaluating stationary source air compliance monitoring programs. This revised policy replaces the previous 1991 CMS and is to take effect immediately. Therefore, fiscal year 2002 air compliance monitoring programs should be negotiated consistent with the revised policy.

The major changes to CMS from the previous 1991 version are as follows:

- (1) Emphasis has been placed on Title V major sources and a limited subset of synthetic minor sources.
- (2) Minimum frequencies have been recommended for determining the compliance status of facilities covered by this policy. Alternatives may be developed and negotiated with the Regions to enable States/locals to address important local compliance issues.
- (3) The policy explicitly recognizes that a variety of tools ranging from self-certifications to traditional stack tests are available and should be used to evaluate compliance. It further recognizes that on-site visits may not be necessary to evaluate the compliance status of a facility given the wide range of self-reported information such as annual Title V compliance certifications, deviation reports, and semi-annual monitoring reports based on periodic monitoring and compliance assurance monitoring. However, to ensure a compliance presence in the field, a minimum frequency for on-site visits has been recommended.
- (4) Three categories of compliance monitoring replace the current levels of inspection. The new compliance monitoring categories are: Full Compliance Evaluations, Partial Compliance Evaluations, and Investigations.
- (5) CMS plans are no longer required to be submitted every year, but may be submitted once every two years.

To facilitate implementation of the revised CMS in FY 2002, changes are

currently being made to the Aerometric Information Retrieval System/AIRS Facility Subsystem (AIRS/AFS) and are being incorporated in the Information Collection Request, "Source Compliance and State Action Reporting," OMB Number 2060-0391. AIRS/AFS is the national compliance and enforcement data system for stationary sources of air pollution and serves as a repository for access to EPA as well as State/local compliance monitoring data. Specifically, changes are being made to AIRS/AFS to provide for additional collection activities associated with identifying facilities; conducting compliance evaluations; and the input of information on Title V compliance certifications and stack tests. Changes to the system are scheduled to be completed by the end of this fiscal year. To the extent that AIRS/AFS is replaced by another system, these changes also will apply to its successor.

The purpose of this technical support document is to explain the changes that are being made to AIRS/AFS to accommodate the revised CMS, and to provide detailed information on the specific system enhancements and new AFS fields. As part of an ongoing effort to work with the States and locals in implementing this policy, EPA is providing training in each Regional office on the overall policy, as well as the resulting changes in AIRS/AFS.

SECTION 1: CMS REPORTING

Changes have been made in the national air compliance data system (AIRS/AFS) to facilitate the reporting of information consistent with the revised structure of this policy. In addition, the Source Compliance and State Action Reporting ICR have been revised to incorporate the new data elements.

In order to collect compliance information in a format that allows EPA to evaluate and compare compliance monitoring programs, Regions and States/locals will need to:

- C Continue to maintain records of compliance monitoring activities, and on a routine basis, report these activities and the results in AIRS/AFS, or its successor
- C Continue to designate the High Priority Violation (HPV) status of violating facilities in accordance with the EPA HPV Policy dated December 22, 1998
- C Report Full Compliance Evaluations (FCE), Partial Compliance Evaluations (PCE) and Investigations at the facility level in AIRS/AFS, or its successor
- C Report Title V annual compliance certification reviews
- C Report all stack tests

The following subsections summarize the CMS reporting with regard to AFS and describe how AFS accommodates these needs.

Table 1-1 is a listing of new AFS fields and their properties and will be further elaborated on in the following sections.

Table 1-1: New AFS fields

| Data Element Name | AFS Acronym | Format | Length | Required | Valid Values | Security | File Location | Screen Number | Batch Trans & seq # |
|---------------------------------|----------------|--------|--------|---|--|---|---------------|------------------------------|---|
| CMS Source Category | CMSC | alpha | 1 | No | A, M,S & O | Update - limited by special access code Read - public | Plant CMS | Update - 315 Browse - 516 | Transaction 18 Sequence 1 column 14 |
| CMS Source Category Description | CMSD | alpha | 20 | generated from descriptions in Table File | A=Title V Major M=Mega-site S=80%SM O=Other | Update -N/A Read - Public | Plant CMS | Update - N/A Browse - 516 | N/A |
| CMS Minimum Frequency Indicator | CMSI | alpha | 1 | No | 1-9 | Update - limited by special access code Read - Sensitive | Plant CMS | Update - 315 Browse - 516 | Transaction 18 Sequence 1 Column 15 |
| Fiscal Year of FC E | CMYA - CMYE | alpha | 4 | No | numerics >= 2002 | Update - limited by special access code Read - Sensitive | Plant CMS | Update - 315 Browse - 516 | Transaction 18 Sequence 1 Columns 16-19, 21-24, 26-29, 31-34 & 36-39 |
| On-Site Visit Indicator | CMOA - CMOE | alpha | 1 | No | Y = Yes N = No | Update - limited by special access code Read - Sensitive | Plant CMS | Update - 315 Browse - 516 | Transaction 18 Sequence 1 Columns 20, 25, 30, 35 & 40 |
| State FCE Type | SFT1 | alpha | 2 | generated from plant actions | N/A | None | Plant CMS | Update - N/A Browse - 516 | N/A |
| State FCE Date | SFD1 | alpha | 8 | generated from plant actions | generated in YYYYMMDD format | None | Plant CMS | Update - N/A Browse - 516 | N/A |

Table 1-1 (continued): New AFS fields

| Data Element Name | AFS Acronym | Format | Length | Required | Valid Values | Security | File Location | Screen Number | |
|----------------------------------|-------------|--------|--------|------------------------------|------------------------------|---|---------------|------------------------------|---|
| EPA FCE Type | EFT1 | alpha | 2 | generated from plant actions | N/A | None | Plant CMS | Update - N/A Browse - 516 | N/A |
| EPA FCE Date | EFD1 | alpha | 8 | generated from plant actions | generated in YYYYMMDD format | None | Plant CMS | Update - N/A Browse - 516 | N/A |
| Default FCE Type | DFT1 | alpha | 2 | generated using EFT1 & SFT1 | N/A | None | Plant CMS | Update - N/A Browse - 516 | N/A |
| Default FCE Date | DFD1 | alpha | 8 | generated from plant actions | generated in YYYYMMDD format | None | Plant CMS | Update - N/A Browse - 516 | N/A |
| CMS Comment | CM19 | alpha | 39 | No | no validation | Update - limited by special access code Read - Sensitive | Plant CMS | Update - 315 Browse - 516 | Transaction 18 Sequence 1 Columns 41-79 |
| Date Record is Last Updated | DU19 | alpha | 6 | generated | YYMMDD | None | Plant CMS | N/A | N/A |
| Person Updating Record | PU19 | alpha | 3 | generated | NCC User ID | None | Plant CMS | N/A | N/A |
| Special Ad-hoc filtering acronym | CMFY | N/A | 4 | No | N/A | N/A | N/A | N/A | N/A |

1.1 Facility Identification

Identify Title V major sources (including mega-sites) and SM sources at or above 80% of Title V potential to emit threshold (80%SM).

AFS Modification:

Major sources are already identified in AFS through the use of classification code fields (SCL1 & ECL1). Majors and 80% SM's will be further identified in AFS through the use of a new field known as the CMS Source Category (CMSC).

CMS Source Category was initially populated in AFS using the default plant classification value (DCL1). New plants and exceptions to the CMS will be manually input by the Region unless otherwise negotiated with States and Local agencies.

1.2 Compliance Evaluation Tracking

Support the tracking of FCE's, PCE's and Investigations through the addition of regional action types: Complete Review of All Required Reports including Title V Annual Compliance Certifications; Assessment of Control Device and Process Operating Conditions; Visible Emissions Observation Performed; Review of Facility Records and Operating Logs; Assessment of Process Parameters; Assessment of Control Equipment Performance Parameters; and Stack Tests

AFS Modification:

Regional action types with links to appropriate national action types have been added to AFS Action tables. Modifications to existing Regional action types will be made if necessary.

1.3 Title V Annual Compliance Certifications

The following information will need to be entered into AIRS/AFS regarding Title V Annual Compliance Certifications received and reviewed.

Unless otherwise negotiated with States and local agencies, Regions shall enter date due, date received and whether deviations were reported. Regions, States and locals will be responsible for entering date reviewed and results for the annual compliance certifications each of them reviewed.

C Date due - The anniversary date of the annual compliance certification. It

can be derived using permit data previously recorded in AFS and should be recorded as the date scheduled on a 'Title V Annual Compliance Certification Received' action record.

- C Date received - The date the annual compliance certification was received by the Region. This should be recorded as the date achieved on a 'Title V Annual Compliance Certification Received' action record.
- C Deviations - A Y/N indicator will be used to report whether deviations were reported in the annual compliance certification review (Y=deviations were reported, or N=deviations were not reported). This indicator will be recorded in the RD81 (Regional Data Element 8) field on a 'Title V Annual Compliance Certification Reviewed' action record. Details of the deviation may be entered as action comments.
- C Date Reviewed - This is the date the annual compliance certification was reviewed. The review might be performed by a Region, State or local agency. The review date will be recorded as the date achieved on a 'Title V Annual Compliance Certification Reviewed' action record.
- C Results - The results of an annual compliance certification review will be recorded in the results code field on a 'Title V Annual Compliance Certification Reviewed' action record. Valid codes are MC (In compliance), MV (In Violation) or MU (Unknown). When evaluation of a self certification leads to a determination of non-compliance and/or HPV status, then this finding should be documented in the appropriate AIRS/AFS fields.

1.4 Stack Tests

Support tracking of the performance of all stack tests.

AFS Modification:

AFS already supports the recording of stack tests through the use of actions. The date and results data related to the stack test will need to be entered into AFS. Additionally, if a violation is found as a result of the stack test, then appropriate violation data will also be entered into AFS.

- C Date - The date the stack test was performed should be recorded in the Date achieved field of an action record

- C Results - The conclusion of all stack tests should be recorded in the results code field of an action record. Results codes "PP" (Pass) or "FF" (Fail) will be used by the Region, State or local agency.
- C Pollutant - The pollutant related to the conducted stack test may be recorded in the pollutant field of an action.

1.5 Minimum Frequencies

Indicate the minimum frequency of an FCE.

AFS Modification:

The minimum frequency of an FCE will be identified in a new field referred to as the CMS Minimum Frequency Indicator (CMSI). This will represent the number of years allowable between FCE's. CMSI has been initially populated in AFS using the CMS Source Category (CMSC). New plants and exceptions to the CMS will be manually input by the region unless otherwise negotiated with States and Local agencies. This field is enforcement sensitive.

1.6 Unknown Compliance Status

Automatically change the Federal compliance status (ECAP) of a facility to 'unknown by evaluation calculation' if an FCE is not completed in accordance with the CMS Minimum Frequency Indicator (CMSI).

AFS Modification:

An AFS utility that reads the CMS Minimum Frequency Indicator (CMSI), current system date and the EPA/State Date of Last FCE (DFD1) has been developed. Plants that do not maintain FCE action types with a date achieved that falls within the CMSI time frame will have their Federal Compliance Status Code (ECAP) automatically changed to 'unknown by evaluation calculation' using pollutant FACIL (PLAP). PLAP and ECAP are located on the Air Program pollutant record. The Title V air program (ACS1) will be used for Major sources (including Mega sites) and the FESOP or SIP air program (ACS1) will be used for 80%SM sources. Additionally, the utility will 'ungenerate' the 'unknown' status when an FCE has been recorded against the plant.

1.7 Scheduled Full Compliance Evaluations

Support the ability to determine which plants have been scheduled for a FCE for a given fiscal year and if an on-site visit is planned for that year.

AFS Modification:

The fiscal year of the scheduled FCE will be indicated in AFS through the use of year fields known as Fiscal Year of FCE. These are new fields in AFS and will be available to indicate CMS plans for a 5 year period (CMYA-CMYE). Each year field will have an on-site indicator (CMOA-CMOE) identifying whether an on-site visit is planned for that fiscal year.

Although States/Locals, as part of the CMS biennial plan, submit a list of facilities that are scheduled for an FCE in a given fiscal year, the use of these data fields in AFS is optional.

1.8 Annual Scheduled FCE versus Completed FCE

Support the ability to determine which plants have been scheduled for an FCE for a given fiscal year and did not receive one (either no FCE or an FCE outside the FY it was scheduled).

AFS Modification:

Existing AFS Ad-hoc procedures can be used to determine those plants scheduled for an FCE in a given year and actually received one. A new Ad-hoc acronym (CMFY) has been developed to determine those plants which were scheduled for an FCE but did not have one performed.

SECTION 2: AFS ENHANCEMENTS

This section describes AFS enhancements that have been made for implementing CMS into AFS.

2.1 Default Compliance Status

Compliance status is available on numerous AFS records: Plant General, Air Program, Air Program Pollutant, Plant History, Point Air Program and Point History. On each of these records, compliance status is stored in two separate fields, one for State and another for EPA. In addition to State and EPA compliance status, a default compliance status is available. Default compliance status returns the EPA value, but if that is blank, then the State value is returned. Additional information on the various compliance status fields can be found in the Data Dictionary pages in Appendix B of this document.

AFS has been modified so that the default compliance status returns the most “out of compliance” value without priority to either State or EPA. This modification does not effect data input, but rather produces a widely called for correction in data output.

2.2 Default Classification

Classification is available on three AFS records: Plant General, Plant Air Program and Plant Air Program Pollutant. On each of these records, classification is stored in two separate fields, one for State and another for EPA. In addition to State and EPA classification values, default classification is available. Default classification returns the EPA value, but if that is blank, then the State value is returned.

AFS has been modified so that the default classification returns the largest classification without priority to either State or EPA. This modification does not effect data input, but rather produces a widely called for correction in data output.

2.3 Date of Last Inspection & Inspection Type

Three categories of compliance monitoring have replaced the previous levels of inspections. Previous to CMS, AFS maintained plant level fields for the date and type of the latest EPA and State inspections (EID1, EDT1, SID1, SIT1). These were generated from user inspection data. Default values (DID1 & DIT1) at plant level, returned EPA values. These fields have become obsolete with the revised CMS and

AFS has been modified as follows:

- C Removal of EPA and State inspection fields (EID1, EIT1, SID1 & SIT1) from the plant general record and browse screen 500
- C Removal of EID1, EIT1, SID1 & SIT1 from Fixed format 627 report
- C Disabled ad-hoc acronyms EID1, EIT1, SID1, SIT1, DID1 & DIT1
- C Disabled generation of Date of last inspection fields in Browse

Additionally, AFS maintained point level fields for the date and type of the latest point level EPA and State inspections (EID3, EIT3, SID3, SIT3). These were generated from user input inspection data at the point level. Default values (DID3 & DIT3) at point level returned EPA values. The point level fields have been modified as follows:

- C Renamed fields to identify date and type of latest FCE instead of Inspection
- C Generated from FCE data rather than inspection data
- C Renamed acronyms EID3, EIT3, SID3, SIT3, DID3 & DIT3 to EFD3, EFT3, SFD3, SFT3, DFD3 & DFT3 respectively

2.4 New Plant CMS Record

A new record known as Plant CMS has been created in AFS. It will provide easy access to all the CMS related fields and all data entry relating to CMS planning can be performed on one screen. The 19 new fields located on this record are:

- C CMS Source Category (CMSC)
- C CMS Minimum Frequency Indicator (CMSI)
- C 5 year fields (CMYA, CMYB, CMYC, CMYD, CMYE)
- C On-site visit Indicator for each year field (CMOA, CMOB, CMOC, CMOD & CMOE)
- C 39 character comment field (CM19)
- C Date and type of latest EPA FCE (EFD1, EFT1)
- C Date and type of latest State FCE (SFD1, SFT1)
- C Date Record is Updated (DU19)
- C Person Updating Record (PU19)

The CMS Source Category (CMSC) was initially populated in AFS using the default plant classification value (DCL1). Upon agreement with Regional data managers, the following values will be added. Where DCL1= A or A1, CMSC will be populated with a 'A'. Likewise, where DCL1=SM, CMSC will be populated with a 'S'.

New plants and exceptions to the CMS will be manually input by the Region unless otherwise negotiated with States and Local agencies.

The CMS Minimum Frequency Indicator (CMSI) was initially populated in AFS using the CMS Source Category (CMSC). Upon agreement with Regional data managers, the following values will be added. Where CMSC=A, CMSI will be populated with a '2'. If CMSC=S, CMSI will be populated with a '5'. New plants and exceptions to the CMS will be manually input by the Region unless otherwise negotiated with States and Local agencies.

Each of the 5 year fields has an on-site visit indicator. When a year is provided in any of the 5 year fields, the on-site indicator will default to 'Y'.

Updates to the CMS record can be done either online (screen 315) or batch (transaction 18) and browsed on screen 516. Update authority will be restricted by a special access code 'S' and read access is enforcement sensitive. Figure 2-1 provides a Browse view of the new record. Appendix C describes the layout of the batch transaction fields and additional AFS screens are available in Appendix D.

Figure 2-1: Browse Screen 516 - Plant CMS Record

```

DATE   : 09/20/01      AIRS FACILITY SUBSYSTEM - BROWSE      PGM: AFP516
SCREEN: 516            COMPLIANCE MONITORING STRATEGY      MAP: AFM5161
=====
10000 TEST PLANT                      123 TEST DRIVE
-----
                                           ( 2001/09/20 - KGJ )

CMS SOURCE CATEGORY:  A - TITLE V MAJOR

CMS MINIMUM FREQUENCY INDICATOR: 2

PLANNED YEAR(S) OF FULL COMPLIANCE EVALUATION (FCE):
FISCAL YEAR A:  _____  ON-SITE VISIT PLANNED (Y/N):  _
FISCAL YEAR B:  2004      ON-SITE VISIT PLANNED (Y/N):  Y
FISCAL YEAR C:  2006      ON-SITE VISIT PLANNED (Y/N):  N
FISCAL YEAR D:  2008      ON-SITE VISIT PLANNED (Y/N):  Y
FISCAL YEAR E:  2010      ON-SITE VISIT PLANNED (Y/N):  N

COMMENT: SAMPLE COMMENT TEXT

LATEST STATE FCE ACTION:  E2    DATE (YYYYMMDD):  20010515
LATEST EPA FCE ACTION   :  M9    DATE (YYYYMMDD):  20010415

PF1=HELP  PF3=END  PF4=MAIN  PF5=TERM  PF10=SCRN      SCREEN:  ____

```

2.5 Latest Full Compliance Evaluation Date & Type

New AFS fields have been created to replace the obsolete date and type of the most recent EPA and State inspections. These fields will provide the date and type of the most recent EPA (EFD1/EFT1) and State (SFD1/SFT1) FCE. They will be generated from user supplied action data. Default values (DFD1/DFT1) for these fields will be the latest date of either EPA or State FCE. The new fields are located on the new Plant CMS record. Refer to Figure 2-1.

2.6 Utility to Automatically Generate Unknown Compliance

If it is determined that the latest FCE is not within the CMS Minimum Frequency (CMSI) and the default compliance status (DCS1) of the plant is not out of compliance¹ or unknown², then the EPA Compliance Status (ECAP) will be changed to “U” (Unknown by evaluation calculation). If the plant is already out of compliance or unknown with regard to compliance status, no compliance status values will be generated since nothing will be gained by creating another unknown compliance status.

This utility is part of the nightly AFS central batch update process. Whenever a central update is run, the logic to generate an unknown compliance status will be executed. Figure 2-2 shows a flowchart of the generation logic.

2.7 Utility to Automatically Remove Previously Generated Unknown Compliance

When it is determined that the latest FCE is within the CMS Minimum Frequency (CMSI) and the default compliance status (DCS1) of the plant is 'unknown by evaluation calculation', the previously generated records or compliance status values will be removed.

This utility is part of the nightly AFS central batch update process. Whenever a central update is run, the logic to “ungenerate” an unknown compliance status will be executed. Figure 2-3 shows a flowchart of the “ungenerate” logic.

¹ Out of Compliance values are B, 1, 6 & W

²Unknown compliance status values are Y, 0, A, 7 & U

Figure 2-2: Flowchart - Generating Unknown Compliance Status

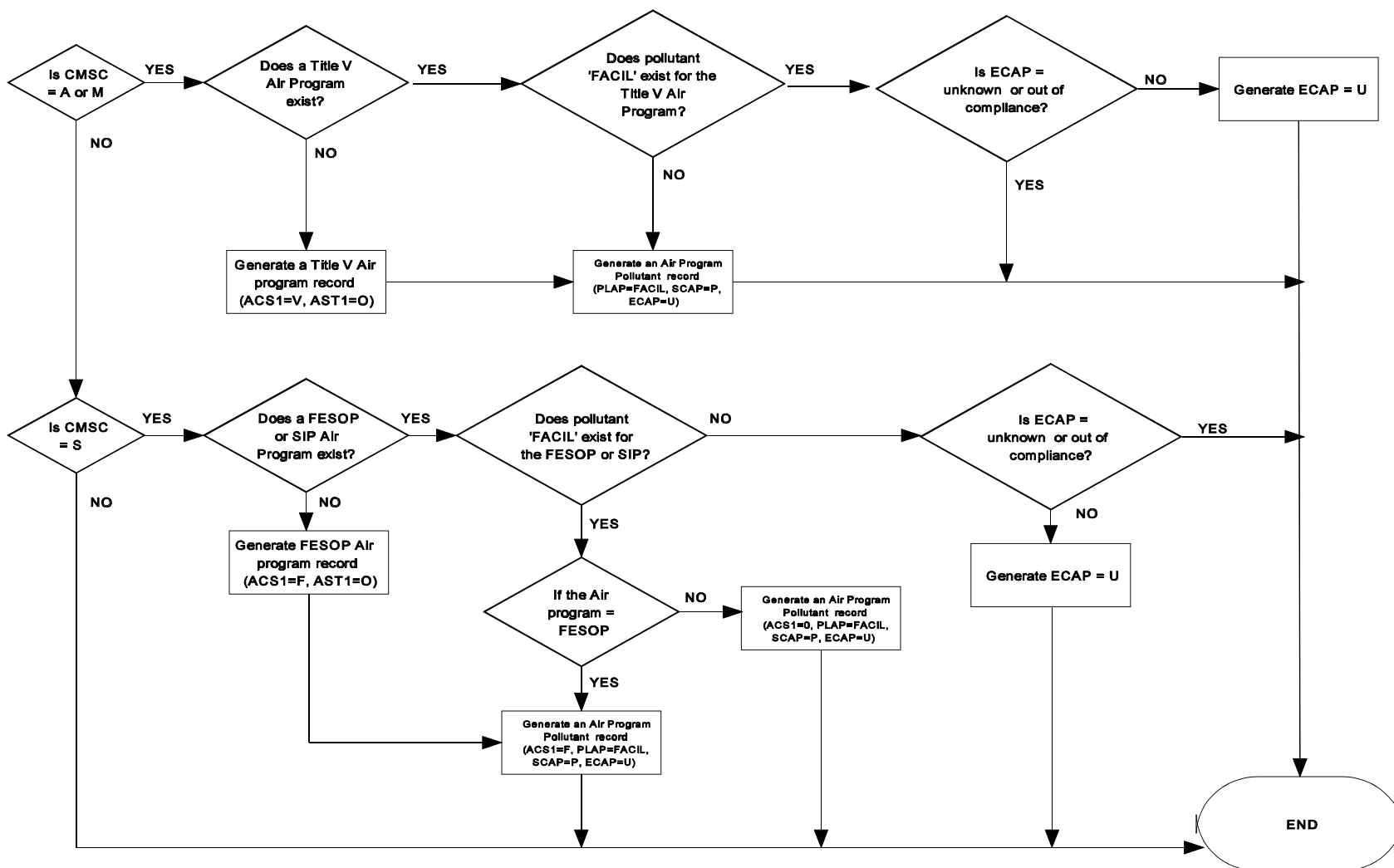
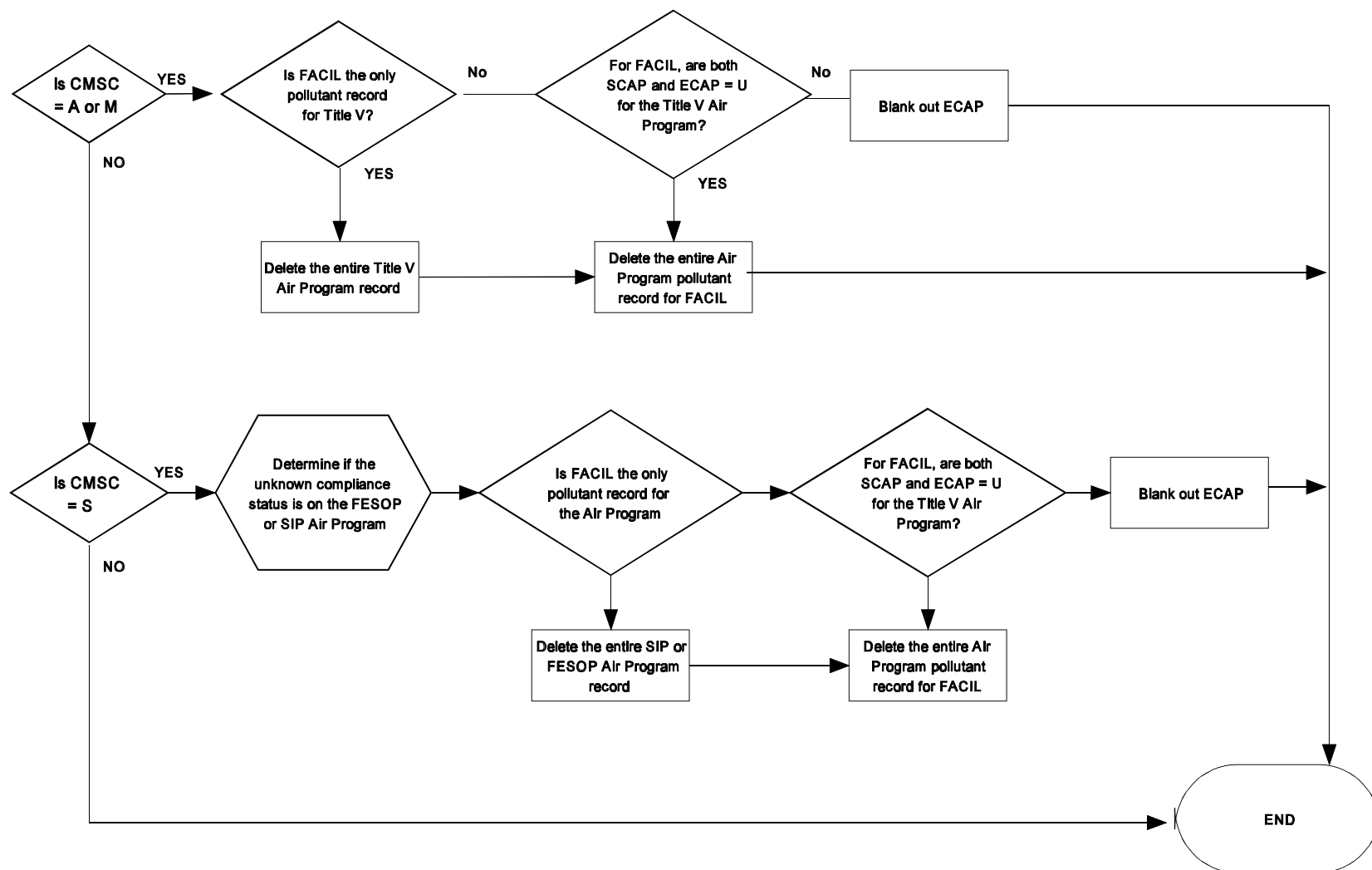


Figure 2-3: Flowchart - Removing a Previously Generated Unknown Compliance Status



2.8 Modify AFS Action Table

The AFS action table has been modified to include new Regional action codes with associated national action types.

| | |
|---|--|
| C | FCE with on-site visit |
| C | FCE without on-site visit |
| C | PCE's with on-site visit |
| C | PCE's without on-site visit |
| C | Investigations |
| C | Stack Tests |
| C | Receipt of Title V Annual Compliance Certification |
| C | Review of Title V Annual Compliance Certification |

2.9 Modify AFS Results Code Table

The AFS Results code table has been modified to include new codes to record the results of stack tests and Title V Annual Certification reviews.

New codes for Title V Annual Certification Reviews include:

| | |
|---|--------------------|
| C | MC - In Compliance |
| C | MV - In Violation |
| C | MU - Unknown |

New codes for the results of Stack Tests include:

| | |
|---|-----------|
| C | PP - Pass |
| C | FF - Fail |

2.10 Full Compliance Evaluation Pathway

A new action linking pathway to track the progress of an FCE will be included in AFS. This pathway will be available for record keeping purposes only and is optional. Once the "FCE" pathway is initiated, no special action types such as addressing or resolution action types will be required and the pathway will not intrude on any other pathway. The Pathway Summary report, FF620 will be modified to include the FCE pathway in the selection criteria.

2.11 Special Ad-hoc Acronym

A new Ad-hoc acronym (CMFY) has been developed to determine those plants that were scheduled for an FCE but did not have one performed. This includes facilities that did not have an FCE performed at all and the ones that had one performed outside the fiscal year it was scheduled. Currently, AFS ad-hoc would not accomodate this type of criteria because of the date range necessary to capture all sources that fit into this universe.

This filtering device available only in Ad-hoc, will be used as selection criteria to indicate the desired fiscal year of the scheduled FCE. In the following example, an AFS ad-hoc selection criteria demonstrates the need for such an acronym.

Consider the fact that five, separate year fields will be available to record the fiscal year of a scheduled FCE. Also consider that the default Date of latest FCE will indicate when the last FCE was performed, and that the selection criteria will need to include dates before the desired fiscal year and dates after the desired fiscal year so that all eligible sources are retrieved. The chart to the right shows selection criteria for an ad-hoc that might list all sources in a given geographic area (region or state) scheduled for an FCE in FY200, but did not have one performed. The resulting ad-hoc report would produce unsuccessful results.

| Acronym | Condition | Value |
|---------|-----------|--------|
| STTE | ME | XX |
| CMYA | CE | 2000 |
| CMYB | CE | 2000 |
| CMYC | CE | 2000 |
| CMYD | CE | 2000 |
| CMYE | CE | 2000 |
| DFD1 | LE | 990930 |
| DFD1 | GE | 001001 |

The new acronym (CMFY) will act as a filtering device to: 1) locate the facilities that are scheduled for an FCE in a given fiscal year; and 2) did not have one performed. Refer to the chart on the right to see how the new acronym would be used and notice how it compares to the previous chart.

| Acronym | Condition | Value |
|---------|-----------|-------|
| STTE | ME | XX |
| CMFY | CE | 2000 |

APPENDIX A:
The Clean Air Act Stationary Source
Compliance Monitoring Strategy (CMS)
April 2001

DISCLAIMER

The discussion in this document is intended solely as guidance. This document is not a regulation. It does not impose legally binding requirements on EPA, States, or the regulated community. This policy does not confer legal rights or impose legal obligations upon any member of the public. The general description provided here may not apply to a particular situation based on the circumstances. Interested parties are free to raise questions and objections about the substance of this policy and the appropriateness of the application of this policy to a particular situation. EPA retains the discretion to adopt approaches on a case-by-case basis that differ from those described in this policy where appropriate. This document may be revised periodically without public notice. EPA welcomes public input on this document at any time.

Any questions concerning this policy may be directed to either Mamie Miller or Rob Lischinsky at 202-564-2300.

CLEAN AIR ACT STATIONARY SOURCE COMPLIANCE MONITORING STRATEGY
April 2001

I INTRODUCTION

- The Clean Air Act Stationary Source Compliance Monitoring Strategy (CMS) was last revised in 1991. In the intervening years, the national policy was not consistently implemented across the country by the EPA Regions and their State/local agencies. Two major factors contributed to this situation: (1) The policy became dated as new Clean Air Act (CAA) programs were implemented, and the Environmental Protection Agency (EPA) planning process changed. (2) EPA Headquarters ceased to provide oversight of the policy on a national level when the Agency's enforcement program was reorganized, thus giving the impression that it was no longer necessary to implement the policy.
- A review by the EPA Office of the Inspector General ("Consolidated Report on OECA's Oversight of Regional and State Air Enforcement Programs," E1G-AE7-03-0045-8100244, September 25, 1998) identified this abandonment as a fundamental problem that adversely affected the effectiveness of the air enforcement program.
- In response to the Office of Inspector General report, the Office of Enforcement and Compliance Assurance (OECA) made a commitment to evaluate how the policy was being implemented, and to revise it as necessary. The Office of Compliance was given the responsibility for satisfying this commitment.
- Between October 1998 and May 1999, interviews were conducted with all of the EPA Regions and twenty-two States. The purpose of these interviews was to collect baseline information on implementation of the policy; obtain feedback on its strengths and weaknesses; and identify any appropriate alternatives. A report entitled "A Review of the Compliance Monitoring Strategy" summarized the findings of these interviews, and was issued on July 26, 1999.
- A Workgroup with representatives from OECA Headquarters, the Regions and several States was formed to review these findings and develop a revised policy.

- The following policy is based on the recommendations of this Workgroup; comments received during the comment period on the draft proposals; and in-depth discussions with representatives of the State and Territorial Air Pollution Program Administrators and the Association of Local Air Pollution Control Officials (STAPPA/ALAPCO).

- The major differences between this policy and the 1991 version are as follows:

- (1) Emphasis has been placed on Title V major sources and a limited subset of synthetic minor sources.

- (2) Minimum frequencies have been recommended for determining the compliance status of facilities covered by this policy. Alternatives may be developed and negotiated with the Regions to enable States/locals to address important local compliance issues.

- (3) The policy explicitly recognizes that a variety of tools ranging from self-certifications to traditional stack tests are available and should be used to evaluate compliance. It further recognizes that on-site visits may not be necessary to evaluate the compliance status of a facility given the wide range of self-reported information such as annual Title V compliance certifications, deviation reports, and semi-annual monitoring reports based on periodic monitoring and compliance assurance monitoring. However, to ensure a compliance presence in the field, a minimum frequency for on-site visits has been recommended.

- (4) Three categories of compliance monitoring replace the current levels of inspection defined in the 1987 Clean Air Act Compliance/Enforcement Guidance Manual. The new compliance monitoring categories are: Full Compliance Evaluations, Partial Compliance Evaluations and Investigations.

- (5) CMS plans are no longer required to be submitted every year, but may be submitted once every two years.

II GOALS OF THE COMPLIANCE MONITORING STRATEGY

1. Provide national consistency in developing stationary

source air compliance monitoring programs, while at the same time provide States/locals with flexibility to address local air pollution and compliance concerns.

2. Improve communication between States/locals and Regions on stationary source air compliance monitoring programs, and enhance EPA oversight of these programs.

3. Provide a framework for developing stationary source air compliance monitoring programs that focuses on achieving measurable environmental results.

4. Provide a mechanism for recognizing and utilizing the wide range of tools available for evaluating and determining compliance.

III OVERALL PROCESS

1. States/locals submit a CMS plan biennially for discussion with and approval by the Regions. Regions also prepare a plan biennially for discussion with their States/locals.

2. The plans are summarized, and incorporated into the annual Regional response to the OECA Memorandum of Agreement (MOA).

3. States/locals and Regions maintain records of their compliance monitoring activities, and enter facility-specific compliance data in the national air compliance data base (AIRS/AFS, or its successor).

4. States/locals and Regions review the results of the compliance monitoring activities annually, and prepare an annual update to the biennial plan as necessary. Major redirections are discussed as they arise.

5. Regions conduct in-depth evaluations of the overall State/local compliance monitoring program periodically. Headquarters conducts similar evaluations of the Regional programs as well.

IV SCOPE OF POLICY

- EPA recognizes that State/local agencies perform additional compliance monitoring activities beyond those addressed by this policy. This policy is not designed to preclude those activities, but focuses on federally enforceable requirements for the following source categories: (1) Title V major sources; and (2) synthetic minor sources that emit or have the potential to emit at or above 80 per cent of the Title V major source threshold. For purposes of this policy, potential to emit means the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable or legally and practicably enforceable by a state or local air pollution control agency.

The 80 per cent threshold was selected to ensure that those facilities that either have the potential to emit or actually emit pollutants close to the major source threshold are evaluated periodically. This enables States/locals to focus resources on those facilities that are most environmentally significant. In determining whether a synthetic minor source falls within the scope of this policy, all facilities with the potential to emit at or above the 80 per cent threshold are included regardless of whether their actual emissions are lower.

V COMPLIANCE MONITORING CATEGORIES

- States/locals and Regions are encouraged to use a variety of techniques to determine compliance, and utilize the full range of self-monitoring information stemming from the 1990 CAA Amendments.
- Consistent with this approach, there are three categories of compliance monitoring: Full Compliance Evaluations, Partial Compliance Evaluations, and Investigations. Each of these categories is defined below:

1. Full Compliance Evaluations

A Full Compliance Evaluation is a comprehensive

evaluation of the compliance status of a facility. (For the purposes of this policy, "facility" is used in the broadest sense of the term incorporating all regulated emission units within the facility.) It addresses all regulated pollutants at all regulated emission units. Furthermore, it addresses the current compliance status of each emission unit, as well as the facility's continuing ability to maintain compliance at each emission unit.

A Full Compliance Evaluation should include the following:

- A review of all required reports, and to the extent necessary, the underlying records. This includes all monitored data reported to the regulatory agency (e.g., CEM and continuous parameter monitoring reports, malfunction reports, excess emission reports). It also includes a review of Title V self-certifications, semi-annual monitoring and periodic monitoring reports, and any other reports required by permit.
- An assessment of control device and process operating conditions as appropriate. An on-site visit to make this assessment may not be necessary based upon factors such as the availability of continuous emission and periodic monitoring data, compliance certifications, and deviation reports. Examples of source categories that may not require an on-site visit to assess compliance include, but are not limited to, gas-fired compressor stations, boilers in large office and apartment buildings, peaking stations, and gas turbines.
- A visible emission observation as needed.
- A review of facility records and operating logs.
- An assessment of process parameters such as feed rates, raw material compositions, and process rates.
- An assessment of control equipment performance parameters (e.g., water flow rates, pressure drop, temperature, and electrostatic precipitator power levels).
- A stack test where there is no other means for determining compliance with the emission limits. In determining whether a stack test is necessary,

States/locals should consider factors such as: size of emission unit; time elapsed since last stack test; results of that test and margin of compliance; condition of control equipment; and availability and results of associated monitoring data.

In addition to conducting a stack test when there is no other means of determining compliance, States/locals should conduct a stack test whenever they deem appropriate.

A Full Compliance Evaluation should be completed within the fiscal year in which the commitment is made, except in the case of extremely large, complex facilities (hereafter referred to as mega-sites). Regulatory agencies may take up to three years to complete a Full Compliance Evaluation at a mega-site, provided the agency is conducting frequent on-site visits or Partial Compliance Evaluations throughout the entire evaluation period.

A Full Compliance Evaluation may be done piecemeal through a series of Partial Compliance Evaluations.

2. Partial Compliance Evaluations

A Partial Compliance Evaluation is a documented compliance assessment focusing on a subset of regulated pollutants, regulatory requirements, or emission units at a given facility. A Partial Compliance Evaluation should be more comprehensive than a cursory review of individual reports. It may be conducted solely for the purpose of evaluating a specific aspect of a facility, or combined over the course of a year (or up to three years at mega-sites) to satisfy the requirements of a Full Compliance Evaluation.

This type of evaluation could be used for example to effectively assess compliance with the HON MACT requirements if that is the primary area of concern at a chemical manufacturing facility. If at some point later in the year, the regulatory agency decided a Full Compliance Evaluation was necessary, the agency could

combine the results of the MACT evaluation with subsequent evaluations focusing on the balance of other CAA requirements.

3. Investigations

An Investigation can be distinguished from the other two categories in that generally it is limited to a portion of a facility, is more resource intensive, and involves a more in-depth assessment of a particular issue. It usually is based on information discovered during a Full Compliance Evaluation, or as the result of a targeted industry, regulatory or statutory initiative. Also, an Investigation often requires the use and analysis of information not available in EPA data systems. It is best used when addressing issues that are difficult to evaluate during a routine Full Compliance Evaluation because of time constraints, the type of preliminary field work required, and/or the level of analytical expertise needed to determine compliance.

Examples of this category of compliance monitoring are the in-depth PSD/NSR and NSPS reviews conducted by EPA of the pulp, utility and petroleum refining industries. These investigations were initiated following analyses of publicly available information on growth within the industries, and a comparison of this information to data maintained by the regulatory agencies on the number of PSD/NSR permits issued during the same timeframe. The analyses indicated that many facilities failed to obtain the necessary permits. As a result, the facilities had not controlled pollutant emissions as required, and thus realized significant economic benefits.

For a more complete definition of an Investigation, see "MOA Guidance (Air Program)-Clarification and National Performance Measures Strategy (NPMS) Pilot" from Eric Schaeffer and Elaine Stanley to MOA Coordinators, Enforcement Coordinators, and RS&T Coordinators (October 26, 1998).

VI RECOMMENDED EVALUATION FREQUENCIES

- The following minimum frequencies are recommended:

(1) A Full Compliance Evaluation should be conducted, at a minimum, once every two years at all Title V major sources except those classified as mega-sites. For mega-sites, a Full Compliance Evaluation should be conducted, at a minimum, once every three years.

Each Region, in consultation with affected States/locals, has the flexibility to define and identify mega-sites as it deems appropriate within the Region. However, this universe of facilities is expected to be small. When identifying mega-sites, the Regions should consider the following factors: the number and types of emission units; the volume and character of pollutants emitted; the number and types of control and monitoring systems; the number of applicable regulatory requirements; the availability of monitoring data; the degree of difficulty in determining compliance at individual units and at the entire facility; and the footprint of the facility. Examples of industries that may have qualifying facilities are petroleum refining, integrated steel manufacturing, chemical manufacturing, and pharmaceutical production.

(2) A Full Compliance Evaluation should be conducted, at a minimum, once every five years at synthetic minor sources that emit or have the potential to emit at or above 80 per cent of the Title V major source threshold.

(3) An on-site visit should be conducted, at a minimum, once every five years at all Title V major sources to ensure a compliance presence in the field, verify record reviews, observe modifications or new construction, and identify any major permit deviations.

- In those years when a Full Compliance Evaluation is not conducted, States/locals should continue to review annual compliance certifications, and the underlying reports supporting those certifications (e.g., semi-annual and periodic monitoring reports, continuous emission and continuous parametric monitoring reports, and malfunction and excess emission reports).

VII ALTERNATIVES TO THE RECOMMENDED EVALUATION FREQUENCIES

- States/locals may develop with Regional approval alternatives to the recommended evaluation frequencies. Alternatives may be developed on a facility-by-facility basis, or for an entire source category. However, in determining whether an alternative frequency is appropriate, the following factors should be considered:

- Compliance history,
- Location of facility,
- Potential environmental impact,
- Operational practices (e.g., whether operation is steady state or seasonal),
- Use of control equipment,
- Participation in Agency-sponsored voluntary programs (e.g., Project XL, Performance Track),
- Identified deficiencies in the overall State/local compliance monitoring program.

VIII ELEMENTS OF THE CMS PLAN

- CMS plans should be submitted biennially, consistent with the current EPA two-year MOA planning process. These plans are a building block in the MOA process, and should be finalized so that they can be summarized and incorporated into the Regional MOA submissions to EPA Headquarters. Therefore, they should be completed prior to the beginning of the Federal fiscal year. It is not necessary to duplicate the detailed information in the CMS plan when submitting the Regional MOA response. Rather, Regions should summarize and reference the CMS plans as appropriate.

- A separate CMS plan is not necessary if Regions and States/locals wish to continue using other formally negotiated documents (e.g., Selective Enforcement Agreements, Performance Partnership Agreements, and Grant Agreements), provided these documents contain the same level of detail discussed below. If this approach is selected, the document should specifically state that it satisfies the CMS plan.

- The content of CMS plans will vary depending upon whether States/locals develop and negotiate alternatives to the minimum frequencies.

- In those instances where States/locals meet the recommended minimum frequencies and do not develop and negotiate alternative approaches, the plan should include the following elements:

(1) A facility-specific list (including the AFS identification numbers) of all Title V major sources. The list should identify by fiscal year those facilities for which a Full Compliance Evaluation will be conducted. It should also identify those for which an on-site visit will be conducted.

(2) A facility-specific list (including the AFS identification numbers) of all synthetic minor sources and a list of those facilities covered by the policy. It also should identify by fiscal year those facilities for which a Full Compliance Evaluation will be conducted.

(3) A description of how a State/local will address any identified program deficiencies in its compliance monitoring program. These deficiencies can stem from evaluations conducted internally, or by outside organizations such as the EPA Office of Inspector General.

- In those instances where the States/locals propose alternatives to the recommended minimum frequencies, States/locals should provide a more detailed plan. In addition to the above elements, States/locals should include a rationale describing: (1) why it is not necessary to evaluate specific facilities or source categories subject to the minimum frequencies; and (2) why it is appropriate to substitute other facilities.

- If at the end of the first year, States/locals anticipate or know that they will be unable to meet their two year commitments by the end of the second year, they should notify the Region and revise their CMS plan accordingly.

- The "Source Compliance and State Action Reporting Information Collection Request" (ICR), OMB Number 2060-0391, will be revised to incorporate the development and submission of this plan.

IX COMPLIANCE MONITORING REPORTS

- States/locals may continue to format compliance monitoring reports as they deem appropriate; however, the following basic elements should be addressed in the reports.

- (1) General information--date, compliance monitoring category (i.e., Full Compliance Evaluation, Partial Compliance Evaluation, or Investigation), and official submitting the report.
- (2) Facility information--facility name, location, mailing address, facility contact and phone number, Title V designation and mega-site designation.
- (3) Applicable requirements--all applicable requirements including regulatory requirements and permit conditions.
- (4) Inventory and description of regulated emission units and processes.
- (5) Information on previous enforcement actions.
- (6) Compliance monitoring activities--processes and emission units evaluated; on-site observations; whether compliance assistance was provided and if so, nature of assistance; any action taken by facility to come back into compliance during on-site visit.
- (7) Findings and recommendations relayed to the facility during the compliance evaluation. Please note, this does not apply to information traditionally reserved for enforcement case files.

In providing the above information, States/locals should reference or attach other relevant documents as appropriate to avoid duplication. For example, the relevant section of a Title V permit could be attached to the compliance monitoring report rather than rewriting all of the applicable requirements.

- Compliance monitoring reports should be maintained and made available to the Regions upon request. Regions shall maintain similar files of regional activities and provide Headquarters with access upon request.

X REPORTING

- Changes will be made in the national air compliance data base (AIRS/AFS) to facilitate the reporting of information consistent with the revised structure of this policy. In addition, the ICR will be revised to incorporate the new data elements. In order to collect compliance information in a format that allows EPA to evaluate and compare compliance monitoring programs, Regions and States/locals will need to:

- Continue to maintain records of compliance monitoring activities, and report these activities and the results in AIRS/AFS, or its successor, on a routine basis.

- Continue to designate the High Priority Violator (HPV) status of violating facilities in accordance with the EPA HPV Policy dated December 22, 1998.

- Utilize the following compliance monitoring categories to report activities at the facility level in AIRS/AFS, or its successor:

- Full Compliance Evaluations
- Partial Compliance Evaluations
- Investigations

- Report the following information for all Title V annual compliance certification reviews in AIRS/AFS, or its successor:

- date due
- date received
- whether deviations were reported
- date reviewed
- compliance status

Please note: Regions shall enter the first three data elements for each Title V compliance certification unless otherwise negotiated with States/locals.

- Enter the date and results of all stack tests in AIRS/AFS, or its successor, and adjust the HPV status as appropriate.

- The compliance status of a facility will automatically revert from "in compliance" to "unknown" if a Full Compliance Evaluation is not completed:

- within the recommended minimum evaluation frequencies, or
- in accordance with negotiated alternatives that extend the recommended minimum evaluation frequencies.

XI EVALUATION/OVERSIGHT

- At the end of each fiscal year, the Regions shall evaluate whether the States/locals met their commitments, and in those cases where they did not, determine why they did not and what adjustments need to be made for the following year. EPA Headquarters shall in turn conduct a similar analysis nationally. This information should be transmitted back to the appropriate officials in a timely manner so that they can make mid-course corrections in their program if necessary.
- Regions periodically shall conduct more in-depth analysis of the compliance monitoring program as a whole. They should look beyond how successful States/locals have been in meeting commitments, and evaluate for example whether adequate inspector training is available; quality monitoring evaluations are being conducted; violations are being found and are significant enough to warrant enforcement action; and data are accurately reported in a timely manner. They should also assess whether States/locals are using an appropriate mix of compliance monitoring techniques, and making full use of all available data. In addition, Regions should attempt to quantify the impact of the compliance monitoring program on parameters such as compliance rates; specific and general deterrence; and moving beyond compliance. To the extent possible, Regions should inform States/locals in advance of the criteria that will be used in the more in-depth analyses.

Regions shall prepare and submit to Headquarters a plan describing the approach and schedule they intend to use for conducting these more in-depth evaluations.

Headquarters shall conduct similar evaluations of each Region, and use the information to monitor implementation of the policy; identify program deficiencies and successes; establish national trends; compare programs; and develop new national priorities. To the extent possible, Headquarters should inform Regions in advance of the criteria that will be used in evaluating Regional programs.

APPENDIX B: AFS Data Dictionary Pages

CMS SOURCE CATEGORY INDICATOR

DATA ELEMENT NAME: CMS SOURCE CATEGORY INDICATOR

DESCRIPTION : A 1-POSITION FIELD USED TO INDICATE THE SOURCE
CATEGORY TO WHICH A FACILITY SUBJECT TO CMS BELONGS.

FORMAT : ALPHANUMERIC

LENGTH : 1

SECURITY : UPDATE ACCESS RESTRICTED BY SPECIAL ACCESS CODE

OWNERSHIP : COMPLIANCE

MANDATORY : NO

| REPORT | UPDATE | BROWSE | CARD | | | |
|---------|--------|--------|-------|-----|-------|-----------|
| ACRONYM | SCREEN | SCREEN | TYPE | SEQ | COLS. | FILE |
| ----- | ----- | ----- | ----- | --- | ----- | ----- |
| CMSC | 315 | 516 | 18 | 1 | 14 | PLANT CMS |

VALID VALUES ... :

A - TITLE V MAJOR

S - 80% SYNTHETIC MINOR

M - MEGA-SITE

O - OTHER/ALTERNATE FACILITIES

CMS SOURCE CATEGORY DESCRIPTION

DATA ELEMENT NAME: CMS SOURCE CATEGORY DESCRIPTION

DESCRIPTION : A TWENTY CHARACTER DESCRIPTION OF A CMS SOURCE
CATEGORY INDICATOR.

FORMAT : ALPHANUMERIC
LENGTH : 20
SECURITY : NONE
OWNERSHIP : COMPLIANCE
MANDATORY : NO

| REPORT | UPDATE | BROWSE | CARD | | | |
|---------|--------|--------|------|-----|-------|-----------|
| ACRONYM | SCREEN | SCREEN | TYPE | SEQ | COLS. | FILE |
| ----- | ----- | ----- | ---- | --- | ----- | ---- |
| CMSD | | 516 | | | | PLANT CMS |

VALID VALUES ... :

CMS SOURCE CATEGORY DESCRIPTION IS GENERATED FOR VALID VALUES ON THE AFS
DESCRIPTION TABLE MAINTAINED WITHIN AFS IN THE AFS TABLE FILE.

A - TITLE V MAJOR
S - 80% SYNTHETIC MINOR
M - MEGA-SITE
O - OTHER/ALTERNATE FACILITIES

CMS MINIMUM FREQUENCY INDICATOR

DATA ELEMENT NAME: CMS MINIMUM FREQUENCY INDICATOR

DESCRIPTION : A 1-POSITION FIELD USED TO INDICATE THE NUMBER OF
YEARS ALLOWABLE BETWEEN FULL COMPLIANCE EVALUATIONS.
IT SHOULD BE USED FOR FACILITIES SUBJECT TO THE CMS.

FORMAT : ALPHANUMERIC

LENGTH : 1

SECURITY : UPDATE ACCESS RESTRICTED BY SPECIAL ACCESS CODE
READ ACCESS IS LIMITED TO USERS WITH SENSITIVE READ
AUTHORITY

OWNERSHIP : COMPLIANCE

MANDATORY : NO

| REPORT | UPDATE | BROWSE | CARD | | | |
|---------|--------|--------|------|-----|-------|-----------|
| ACRONYM | SCREEN | SCREEN | TYPE | SEQ | COLS. | FILE |
| ----- | ----- | ----- | ---- | --- | ----- | ---- |
| CMSI | 315 | 516 | 18 | 1 | 15 | PLANT CMS |

VALID VALUES ... :

1 - 9

FISCAL YEAR OF FULL COMPLIANCE EVALUATION

DATA ELEMENT NAME: FISCAL YEAR OF FULL COMPLIANCE EVALUATION

DESCRIPTION : FISCAL YEAR USED TO IDENTIFY THE YEAR THAT A FULL COMPLIANCE EVALUATION HAS BEEN SCHEDULED AS DEFINED IN THE CMS PLAN.

FORMAT : NUMERIC

LENGTH : 4; OCCURS 5 TIMES

SECURITY : UPDATE ACCESS RESTRICTED BY SPECIAL ACCESS CODE
READ ACCESS IS LIMITED TO USERS WITH SENSITIVE READ
AUTHORITY

OWNERSHIP : COMPLIANCE

MANDATORY : NO

| REPORT ACRONYM ----- | UPDATE SCREEN ----- | BROWSE SCREEN ----- | CARD TYPE ---- | SEQ --- | COLS. ----- | FILE ---- |
|----------------------------|---------------------------|---------------------------|----------------------|------------|----------------|--------------|
| CMYA | 315 | 516 | 18 | 1 | 16-19 | PLANT CMS |
| CMYB | 315 | 516 | 18 | 1 | 21-24 | PLANT CMS |
| CMYC | 315 | 516 | 18 | 1 | 26-29 | PLANT CMS |
| CMYD | 315 | 516 | 18 | 1 | 31-34 | PLANT CMS |
| CMYE | 315 | 516 | 18 | 1 | 36-39 | PLANT CMS |

VALID VALUES ... :

NUMERIC AND GREATER THAN OR EQUAL TO 2002

ON-SITE VISIT INDICATOR

DATA ELEMENT NAME: ON-SITE VISIT INDICATOR

DESCRIPTION : A Y/N INDICATOR USED TO IDENTIFY IF AN ON-SITE VISIT IS PLANNED FOR A GIVEN FISCAL YEAR. DEFAULT VALUE IS Y.

FORMAT : ALPHANUMERIC

LENGTH : 1; OCCURS 5 TIMES

SECURITY : UPDATE ACCESS RESTRICTED BY SPECIAL ACCESS CODE
READ ACCESS IS LIMITED TO USERS WITH SENSITIVE READ
AUTHORITY

OWNERSHIP : COMPLIANCE

MANDATORY : NO

| REPORT ACRONYM ----- | UPDATE SCREEN ----- | BROWSE SCREEN ----- | CARD TYPE ---- | SEQ --- | COLS. ---- | FILE ----- |
|----------------------------|---------------------------|---------------------------|----------------------|------------|---------------|---------------|
| CMOA | 315 | 516 | 18 | 1 | 20 | PLANT CMS |
| CMOB | 315 | 516 | 18 | 1 | 25 | PLANT CMS |
| CMOC | 315 | 516 | 18 | 1 | 30 | PLANT CMS |
| CMOD | 315 | 516 | 18 | 1 | 35 | PLANT CMS |
| CMOE | 315 | 516 | 18 | 1 | 40 | PLANT CMS |

VALID VALUES ... :

Y - AN ON-SITE VISIT IS PLANNED

N - AN ON-SITE VISIT IS NOT PLANNED

CMS COMMENT

DATA ELEMENT NAME: CMS COMMENT

DESCRIPTION : A 39-CHARACTER OPTIONAL FIELD WHICH PERMITS USERS TO
ENTER ADDITIONAL INFORMATION PERTAINING TO THE CMS
RECORD.

FORMAT : ALPHANUMERIC

LENGTH : 39

SECURITY : READ ACCESS IS LIMITED TO USERS WITH SENSITIVE READ
AUTHORITY

OWNERSHIP : COMPLIANCE

MANDATORY : NO

| REPORT | UPDATE | BROWSE | CARD | | | |
|---------|--------|--------|------|-----|-------|-----------|
| ACRONYM | SCREEN | SCREEN | TYPE | SEQ | COLS. | FILE |
| ----- | ----- | ----- | ---- | --- | ----- | ---- |
| CM19 | 315 | 516 | 18 | 1 | 41-79 | PLANT CMS |

VALID VALUES ... :

UP TO 39 ALPHANUMERIC CHARACTERS

DATE RECORD IS UPDATED

DATA ELEMENT NAME: DATE RECORD IS UPDATED

DESCRIPTION : GENERATED FIELD CONTAINING THE MOST CURRENT DATE ON WHICH CHANGES WERE MADE TO INFORMATION CONCERNING A RECORD.

FORMAT : ALPHANUMERIC

LENGTH : 6.0

SECURITY : NONE

OWNERSHIP : BOTH

MANDATORY : NO

| REPORT ACRONYM ----- | UPDATE SCREEN ----- | BROWSE SCREEN ----- | CARD TYPE ---- | SEQ --- | COLS. ----- | FILE ----- |
|----------------------------|---------------------------|---------------------------|----------------------|------------|----------------|----------------------|
| DUAB | | 512 | | | | ASBESTOS PERFORMANCE |
| DU00 | | 135 | | | | INVENTORY SIP |
| DU07 | | 135 | | | | INVENTORY COMMENT |
| DU1H | | 504 | | | | HISTORY PLANT |
| DU11 | | 500 | | | | PLANT GENERAL |
| DU12 | | 501 | | | | POLLUTANT PLANT |
| DU13 | | 502 | | | | AIR PGM PLANT |
| DU14 | | 503 | | | | AIR PGM POLLUTANT |
| DU15 | | 505 | | | | PLANT FEE |
| DU16 | | 506 | | | | PLANT MAIL |
| DU17 | | 507 | | | | ACTION PLANT |
| DU18 | | 508 | | | | COMMENT PLANT |
| DU19 | | 516 | | | | PLANT CMS |
| DU21 | | 520 | | | | STACK GENERAL |
| DU22 | | 521 | | | | POLLUTANT STACK |
| DU23 | | 522 | | | | COMMENT STACK |
| DU3H | | 523 | | | | HISTORY POINT |
| DU31 | | 530 | | | | POINT GENERAL |
| DU32 | | 531 | | | | POLLUTANT POINT |
| DU33 | | 532 | | | | AIR PGM POINT |
| DU34 | | 534 | | | | CONT EMIS MONITOR |
| DU35 | | 535 | | | | CONT EMIS EER |
| DU36 | | 536 | | | | POINT TANK |
| DU37 | | 537 | | | | ACTION POINT |
| DU38 | | 538 | | | | COMMENT POINT |
| DU41 | | 540 | | | | SEGMENT GENERAL |
| DU42 | | 541 | | | | POLLUTANT SEGMENT |
| DU43 | | 542 | | | | POLLUTANT CHEMICAL |
| DU44 | | 543 | | | | COMMENT SEGMENT |

DATE RECORD IS UPDATED (CONTINUED)

| | | |
|------|-----|-----------------------|
| DU48 | 544 | PROJECTED POLLUTANT |
| ASDU | 551 | PERMIT |
| | 553 | ASSOCIATIONS |
| PDRU | 554 | EVENT TRACKING ACTION |

VALID VALUES . . . :

DATE FORMAT YYMMDD

PERSON UPDATING RECORD

DATA ELEMENT NAME: PERSON UPDATING RECORD

DESCRIPTION : GENERATED FIELD CONTAINING THE USER ID OF THE PERSON WHO LAST UPDATED THE RECORD.

FORMAT : ALPHANUMERIC

LENGTH : 3

SECURITY : NO

OWNERSHIP : BOTH

MANDATORY : NO

| REPORT | UPDATE | BROWSE | CARD | | | |
|---------|--------|--------|-------|-----|-------|-----------|
| ACRONYM | SCREEN | SCREEN | TYPE | SEQ | COLS. | FILE |
| ----- | ----- | ----- | ----- | --- | ----- | ---- |
| PU19 | | 516 | | | | PLANT CMS |

VALID VALUES ... :

ANY NCC USER ID

EPA PLANT/POINT COMPLIANCE STATUS

DATA ELEMENT NAME: EPA PLANT/POINT COMPLIANCE STATUS

DESCRIPTION : A ONE-CHARACTER CODE WHICH REFLECTS THE EPA'S DETERMINATION OF THE COMPLIANCE OF A FACILITY (OR POINT WITHIN A FACILITY) WITH REGARD TO POLLUTANTS REGULATED BY AN AIR PROGRAM OR BY THE PROCEDURAL REQUIREMENTS OF A PERMIT. THIS VALUE IS NORMALLY POPULATED ONLY WHEN THE EPA ASSESSMENT DIFFERS FROM THE STATE. COMPLIANCE FALLS WITHIN FOUR CATEGORIES: IN, OUT, ON SCHEDULE, AND UNKNOWN. VALUES ENTERED AT THE PLANT AIR PROGRAM POLLUTANT LEVEL ARE COMPARED BY AFS, AND THE MOST SERIOUS GENERATED AND DISPLAYED AT THE PLANT AIR PROGRAM LEVEL. THE MOST SERIOUS AIR PROGRAM VALUES ARE IN TURN DISPLAYED AT THE PLANT GENERAL LEVEL. POINT LEVEL DATA IS NOT EVALUATED FOR THE PURPOSE OF DETERMINING WORST CASE SCENARIOS.

FORMAT : ALPHANUMERIC
 LENGTH : 1.0
 SECURITY : UPDATE ACCESS LIMITED TO EPA COMPLIANCE
 OWNERSHIP : COMPLIANCE
 MANDATORY : NO

| REPORT ACRONYM | UPDATE SCREEN | BROWSE SCREEN | CARD TYPE | SEQ | COLS. | FILE |
|-------------------|------------------------------------|------------------|--------------|-----|-------|---------------|
| ----- | ----- | ----- | ---- | --- | ----- | ----- |
| ECS1 | | 500 | | | | PLANT GENERAL |
| DCS1 | <RETURNS WORST CASE> | | | | | PLANT GENERAL |
| ECA1 | | 502 | | | | AIR PGM PLANT |
| DCA1 | <RETURNS WORST CASE> | | | | | AIR PGM PLANT |
| ECA3 | 332 | 532 | 32 | 1 | 20 | AIR PGM POINT |
| DCA3 | <RETURNS WORST CASE> | | | | | AIR PGM POINT |
| ECH1 | | 504 | | | | HISTORY PLANT |
| ESH1 | <HORIZONTAL DISPLAY OF ALL VALUES> | | | | | HISTORY PLANT |
| DCH1 | <RETURNS WORST CASE> | | | | | HISTORY PLANT |
| DSH1 | <HORIZONTAL DISPLAY OF ALL VALUES> | | | | | HISTORY PLANT |
| ECH3 | | 533 | | | | HISTORY POINT |
| ESH3 | <HORIZONTAL DISPLAY OF ALL VALUES> | | | | | HISTORY POINT |

EPA PLANT/POINT COMPLIANCE STATUS (CONTINUED)

| | | |
|------|------------------------------------|---------------|
| DCH3 | <RETURNS WORST CASE> | HISTORY POINT |
| DSH3 | <HORIZONTAL DISPLAY OF ALL VALUES> | HISTORY POINT |

VALID VALUES ... :
(IN ORDER FROM WORST TO BEST CASE)

OUT OF COMPLIANCE

B - IN VIOLATION WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
 1 - IN VIOLATION - NO SCHEDULE
 6 - IN VIOLATION - NOT MEETING SCHEDULE
 W - IN VIOLATION WITH REGARD TO PROCEDURAL COMPLIANCE

UNKNOWN COMPLIANCE

Y - UNKNOWN WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
 0 - UNKNOWN COMPLIANCE STATUS
 A - UNKNOWN WITH REGARD TO PROCEDURAL COMPLIANCE
 7 - IN VIOLATION - UNKNOWN WITH REGARD TO SCHEDULE
 U - UNKNOWN BY EVALUATION CALCULATION (GENERATED VALUE-NOT AVAILABLE FOR INPUT)

ON SCHEDULE

5 - MEETING COMPLIANCE SCHEDULE

IN COMPLIANCE

C - IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS
 4 - IN COMPLIANCE BY OFF-SITE EVALUATION
 3 - IN COMPLIANCE BY ON-SITE EVALUATION
 M - IN COMPLIANCE - CEMS
 2 - IN COMPLIANCE - SOURCE TEST
 8 - NO APPLICABLE STATE REGULATION
 9 - IN COMPLIANCE - SHUT DOWN
 P - PRESENT, SEE OTHER PROGRAM(S)

EPA PLANT/POINT COMPLIANCE STATUS DESCRIPTION

DATA ELEMENT NAME: EPA PLANT/POINT COMPLIANCE STATUS DESCRIPTION

DESCRIPTION : A TWENTY-FIVE CHARACTER DESCRIPTION OF AN EPA COMPLIANCE STATUS CODE.

FORMAT : ALPHANUMERIC

LENGTH : 25.0

SECURITY : NONE

OWNERSHIP : COMPLIANCE

MANDATORY : NO

| REPORT ACRONYM ----- | UPDATE SCREEN ----- | BROWSE SCREEN ----- | CARD TYPE ---- | SEQ --- | COLS. ----- | FILE ----- |
|----------------------------|----------------------------|---------------------------|----------------------|------------|----------------|---------------|
| EDS1 | | 500 | | | | PLANT GENERAL |
| DDS1 | <RETURNS WORST CASE VALUE> | | | | | PLANT GENERAL |
| EDA1 | | 502 | | | | AIR PGM PLANT |
| DDA1 | <RETURNS WORST CASE VALUE> | | | | | AIR PGM PLANT |
| EDA3 | | 532 | | | | AIR PGM POINT |
| DDA3 | <RETURNS WORST CASE VALUE> | | | | | AIR PGM POINT |
| EDH1 | | | | | | HISTORY PLANT |
| DDH1 | <RETURNS WORST CASE VALUE> | | | | | HISTORY PLANT |
| EDH3 | | | | | | HISTORY POINT |
| DDH3 | <RETURNS WORST CASE VALUE> | | | | | HISTORY POINT |

VALID VALUES ... :

THE EPA COMPLIANCE STATUS DESCRIPTION IS GENERATED FOR VALID VALUES ON THE AFS DESCRIPTION TABLE MAINTAINED WITHIN AFS IN THE AFS TABLE FILE.

(IN ORDER FROM WORST TO BEST CASE)

OUT OF COMPLIANCE

B - IN VIOLATION WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
 1 - IN VIOLATION - NO SCHEDULE
 6 - IN VIOLATION - NOT MEETING SCHEDULE
 W - IN VIOLATION WITH REGARD TO PROCEDURAL COMPLIANCE

EPA PLANT/POINT COMPLIANCE STATUS DESCRIPTION (CONTINUED)

UNKNOWN COMPLIANCE

- Y - UNKNOWN WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
- 0 - UNKNOWN COMPLIANCE STATUS
- A - UNKNOWN WITH REGARD TO PROCEDURAL COMPLIANCE
- 7 - IN VIOLATION - UNKNOWN WITH REGARD TO SCHEDULE
- U - UNKNOWN BY EVALUATION CALCULATION (GENERATED VALUE-NOT AVAILABLE FOR INPUT)

ON SCHEDULE

- 5 - MEETING COMPLIANCE SCHEDULE

IN COMPLIANCE

- C - IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS
- 4 - IN COMPLIANCE BY OFF-SITE EVALUATION
- 3 - IN COMPLIANCE BY ON-SITE EVALUATION
- M - IN COMPLIANCE - CEMS
- 2 - IN COMPLIANCE - SOURCE TEST
- 8 - NO APPLICABLE STATE REGULATION
- 9 - IN COMPLIANCE - SHUT DOWN
- P - PRESENT, SEE OTHER PROGRAM(S)

STATE PLANT/POINT COMPLIANCE STATUS

DATA ELEMENT NAME: STATE PLANT/POINT COMPLIANCE STATUS

DESCRIPTION : A ONE-CHARACTER CODE WHICH REFLECTS THE STATE AGENCY'S DETERMINATION OF THE COMPLIANCE STATUS OF A FACILITY (OR POINT WITHIN A FACILITY) WITH REGARD TO POLLUTANTS REGULATED BY AN AIR PROGRAM OR BY THE PROCEDURAL REQUIREMENTS OF A PERMIT. COMPLIANCE FALLS WITHIN FOUR CATEGORIES: IN, OUT, ON SCHEDULE, AND UNKNOWN. VALUES ENTERED AT THE PLANT AIR PROGRAM POLLUTANT LEVEL ARE COMPARED BY AFS, AND THE MOST SERIOUS GENERATED AND DISPLAYED AT THE PLANT AIR PROGRAM LEVEL. THE MOST SERIOUS OF THE AIR PROGRAM VALUES ARE IN TURN DISPLAYED AT THE PLANT GENERAL LEVEL. POINT LEVEL DATA IS NOT EVALUATED FOR THE PURPOSE OF DETERMINING WORST-CASE SCENARIOS.

FORMAT : ALPHANUMERIC
 LENGTH : 1.0
 SECURITY : NONE
 OWNERSHIP : COMPLIANCE
 MANDATORY : YES

| REPORT | UPDATE | BROWSE | CARD | | | | |
|---------|------------------------------------|--------|------|-----|-------|---------------|--|
| ACRONYM | SCREEN | SCREEN | TYPE | SEQ | COLS. | FILE | |
| ----- | ----- | ----- | ---- | --- | ----- | ----- | |
| SCS1 | | 500 | | | | PLANT GENERAL | |
| SCA1 | | 502 | | | | AIR PGM PLANT | |
| SCH1 | | 504 | | | | HISTORY PLANT | |
| SSH1 | <HORIZONTAL DISPLAY OF VALUES> | | | | | HISTORY PLANT | |
| SCA3 | 332 | 532 | 32 | 1 | 19 | AIR PGM POINT | |
| SCH3 | | 533 | | | | HISTORY POINT | |
| SSH3 | <HORIZONTAL DISPLAY OF ALL VALUES> | | | | | HISTORY POINT | |

STATE PLANT/POINT COMPLIANCE STATUS (CONTINUED)

VALID VALUES ... :

(IN ORDER FROM WORST TO BEST CASE)

OUT OF COMPLIANCE

- B - IN VIOLATION WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
- 1 - IN VIOLATION - NO SCHEDULE
- 6 - IN VIOLATION - NOT MEETING SCHEDULE
- W - IN VIOLATION WITH REGARD TO PROCEDURAL COMPLIANCE

UNKNOWN COMPLIANCE

- Y - UNKNOWN WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
- 0 - UNKNOWN COMPLIANCE STATUS
- A - UNKNOWN WITH REGARD TO PROCEDURAL COMPLIANCE
- 7 - IN VIOLATION - UNKNOWN WITH REGARD TO SCHEDULE
- U - UNKNOWN BY EVALUATION CALCULATION (GENERATED VALUE-NOT AVAILABLE FOR INPUT)

ON SCHEDULE

- 5 - MEETING COMPLIANCE SCHEDULE

IN COMPLIANCE

- C - IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS
- 4 - IN COMPLIANCE BY OFF-SITE EVALUATION
- 3 - IN COMPLIANCE BY ON-SITE EVALUATION
- M - IN COMPLIANCE - CEMS
- 2 - IN COMPLIANCE - SOURCE TEST
- 8 - NO APPLICABLE STATE REGULATION
- 9 - IN COMPLIANCE - SHUT DOWN
- P - PRESENT, SEE OTHER PROGRAM(S)

STATE PLANT/POINT COMPLIANCE STATUS DESCRIPTION

DATA ELEMENT NAME: STATE PLANT/POINT COMPLIANCE STATUS DESCRIPTION

DESCRIPTION : A TWENTY-FIVE CHARACTER COMPLIANCE STATUS CODE DESCRIPTION.

FORMAT : ALPHANUMERIC
 LENGTH : 25.0
 SECURITY : NONE
 OWNERSHIP : COMPLIANCE
 MANDATORY : NO

| REPORT ACRONYM ----- | UPDATE SCREEN ----- | BROWSE SCREEN ----- | CARD TYPE ---- | SEQ --- | COLS. ----- | FILE ----- |
|----------------------------|---------------------------|---------------------------|----------------------|------------|----------------|---------------|
| SDS1 | | 500 | | | | PLANT GENERAL |
| SDA1 | | 502 | | | | AIR PGM PLANT |
| SDH1 | | | | | | HISTORY PLANT |
| SDA3 | | 532 | | | | AIR PGM POINT |
| SDH3 | | | | | | HISTORY POINT |

VALID VALUES ... :

STATE COMPLIANCE STATUS DESCRIPTION IS GENERATED FOR VALID VALUES ON THE AFS DESCRIPTION TABLE MAINTAINED WITHIN AFS IN THE AFS TABLE FILE.

(IN ORDER FROM WORST TO BEST CASE)

OUT OF COMPLIANCE

B - IN VIOLATION WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
 1 - IN VIOLATION - NO SCHEDULE
 6 - IN VIOLATION - NOT MEETING SCHEDULE
 W - IN VIOLATION WITH REGARD TO PROCEDURAL COMPLIANCE

UNKNOWN COMPLIANCE

Y - UNKNOWN WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
 0 - UNKNOWN COMPLIANCE STATUS
 A - UNKNOWN WITH REGARD TO PROCEDURAL COMPLIANCE

STATE PLANT/POINT COMPLIANCE STATUS DESCRIPTION (CONTINUED)

- 7 - IN VIOLATION - UNKNOWN WITH REGARD TO SCHEDULE
- U - UNKNOWN BY EVALUATION CALCULATION (GENERATED VALUE-NOT AVAILABLE FOR INPUT)

ON SCHEDULE

- 5 - MEETING COMPLIANCE SCHEDULE

IN COMPLIANCE

- C - IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS
- 4 - IN COMPLIANCE BY OFF-SITE EVALUATION
- 3 - IN COMPLIANCE BY ON-SITE EVALUATION
- M - IN COMPLIANCE - CEMS
- 2 - IN COMPLIANCE - SOURCE TEST
- 8 - NO APPLICABLE STATE REGULATION
- 9 - IN COMPLIANCE - SHUT DOWN
- P - PRESENT, SEE OTHER PROGRAM(S)

EPA POLLUTANT COMPLIANCE STATUS

DATA ELEMENT NAME: EPA POLLUTANT COMPLIANCE STATUS

DESCRIPTION : A ONE-CHARACTER CODE WHICH REFLECTS THE EPA'S DETERMINATION OF THE COMPLIANCE OF A FACILITY (OR POINT WITHIN A FACILITY) WITH REGARD TO POLLUTANTS REGULATED BY AN AIR PROGRAM OR BY THE PROCEDURAL REQUIREMENTS OF A PERMIT. THIS VALUE IS NORMALLY POPULATED ONLY WHEN THE EPA ASSESSMENT DIFFERS FROM THE STATE. COMPLIANCE FALLS WITHIN FOUR CATEGORIES: IN, OUT, ON SCHEDULE, AND UNKNOWN. VALUES ENTERED AT THE PLANT AIR PROGRAM POLLUTANT LEVEL ARE COMPARED BY AFS, AND THE MOST SERIOUS GENERATED AND DISPLAYED AT THE PLANT AIR PROGRAM LEVEL. THE MOST SERIOUS AIR PROGRAM VALUES ARE IN TURN DISPLAYED AT THE PLANT GENERAL LEVEL. POINT LEVEL DATA IS NOT EVALUATED FOR THE PURPOSE OF DETERMINING WORST CASE SCENARIOS.

FORMAT : ALPHANUMERIC
 LENGTH : 1.0
 SECURITY : NONE
 OWNERSHIP : COMPLIANCE
 MANDATORY : NO

| REPORT | UPDATE | BROWSE | CARD | | | |
|---------|----------------------------|--------|------|-----|-------|--------------|
| ACRONYM | SCREEN | SCREEN | TYPE | SEQ | COLS. | FILE |
| ----- | ----- | ----- | ---- | --- | ----- | ----- |
| ECAP | 303 | 503 | 13 | 1 | 28 | AIR PGM PLLT |
| DCAP | <RETURNS WORST CASE VALUE> | | | | | AIR PGM PLLT |

VALID VALUES ... :

(IN ORDER FROM WORST TO BEST CASE)

OUT OF COMPLIANCE

B - IN VIOLATION WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
 1 - IN VIOLATION - NO SCHEDULE

EPA POLLUTANT COMPLIANCE STATUS (CONTINUED)

- 6 - IN VIOLATION - NOT MEETING SCHEDULE
- W - IN VIOLATION WITH REGARD TO PROCEDURAL COMPLIANCE

UNKNOWN COMPLIANCE

- Y - UNKNOWN WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
- 0 - UNKNOWN COMPLIANCE STATUS
- A - UNKNOWN WITH REGARD TO PROCEDURAL COMPLIANCE
- 7 - IN VIOLATION - UNKNOWN WITH REGARD TO SCHEDULE
- U - UNKNOWN BY EVALUATION CALCULATION (GENERATED VALUE-NOT AVAILABLE FOR INPUT)

ON SCHEDULE

- 5 - MEETING COMPLIANCE SCHEDULE

IN COMPLIANCE

- C - IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS
- 4 - IN COMPLIANCE BY OFF-SITE EVALUATION
- 3 - IN COMPLIANCE BY ON-SITE EVALUATION
- M - IN COMPLIANCE - CEMS
- 2 - IN COMPLIANCE - SOURCE TEST
- 8 - NO APPLICABLE STATE REGULATION
- 9 - IN COMPLIANCE - SHUT DOWN
- P - PRESENT, SEE OTHER PROGRAM(S)

EPA POLLUTANT COMPLIANCE STATUS DESCRIPTION

DATA ELEMENT NAME: EPA POLLUTANT COMPLIANCE STATUS DESCRIPTION

DESCRIPTION : A TWENTY-FIVE CHARACTER DESCRIPTION OF AN EPA
POLLUTANT COMPLIANCE CODE.

FORMAT : ALPHANUMERIC

LENGTH : 25.0

SECURITY : NONE

OWNERSHIP : COMPLIANCE

MANDATORY : NO

| REPORT | UPDATE | BROWSE | CARD | | | | |
|--------------------|----------------------------|--------|------|-----|-------|--------------|--|
| ACRONYM | SCREEN | SCREEN | TYPE | SEQ | COLS. | FILE | |
| ----- | ----- | ----- | ---- | --- | ----- | ----- | |
| EDAP | | 503 | | | | AIR PGM PLLT | |
| DDAP | <RETURNS WORST CASE VALUE> | | | | | AIR PGM PLLT | |
| VALID VALUES ... : | | | | | | | |

EPA POLLUTANT COMPLIANCE STATUS DESCRIPTION IS GENERATED FOR VALID VALUES ON
THE AFS DESCRIPTION TABLE MAINTAINED WITHIN AFS IN THE AFS TABLE FILE.

(IN ORDER FROM WORST TO BEST CASE)

OUT OF COMPLIANCE

B - IN VIOLATION WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
1 - IN VIOLATION - NO SCHEDULE
6 - IN VIOLATION - NOT MEETING SCHEDULE
W - IN VIOLATION WITH REGARD TO PROCEDURAL COMPLIANCE

UNKNOWN COMPLIANCE

Y - UNKNOWN WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
0 - UNKNOWN COMPLIANCE STATUS
A - UNKNOWN WITH REGARD TO PROCEDURAL COMPLIANCE
7 - IN VIOLATION - UNKNOWN WITH REGARD TO SCHEDULE
U - UNKNOWN BY EVALUATION CALCULATION (GENERATED VALUE-NOT AVAILABLE FOR
INPUT)

EPA POLLUTANT COMPLIANCE STATUS DESCRIPTION (CONTINUED)

ON SCHEDULE

5 - MEETING COMPLIANCE SCHEDULE

IN COMPLIANCE

C - IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS
4 - IN COMPLIANCE BY OFF-SITE EVALUATION
3 - IN COMPLIANCE BY ON-SITE EVALUATION
M - IN COMPLIANCE - CEMS
2 - IN COMPLIANCE - SOURCE TEST
8 - NO APPLICABLE STATE REGULATION
9 - IN COMPLIANCE - SHUT DOWN
P - PRESENT, SEE OTHER PROGRAM(S)

STATE POLLUTANT COMPLIANCE STATUS

DATA ELEMENT NAME: STATE POLLUTANT COMPLIANCE STATUS

DESCRIPTION : A ONE-CHARACTER CODE WHICH REFLECTS THE STATE AGENCY'S DETERMINATION OF THE COMPLIANCE STATUS OF A FACILITY (OR POINT WITHIN A FACILITY) WITH REGARD TO POLLUTANTS REGULATED BY AN AIR PROGRAM OR BY THE PROCEDURAL REQUIREMENTS OF A PERMIT. COMPLIANCE FALLS WITHIN FOUR CATEGORIES: IN, OUT, ON SCHEDULE, AND UNKNOWN. VALUES ENTERED AT THE PLANT AIR PROGRAM POLLUTANT LEVEL ARE COMPARED BY AFS, AND THE MOST SERIOUS GENERATED AND DISPLAYED AT THE PLANT AIR PROGRAM LEVEL. THE MOST SERIOUS OF THE AIR PROGRAM VALUES ARE IN TURN DISPLAYED AT THE PLANT GENERAL LEVEL. POINT LEVEL DATA IS NOT EVALUATED FOR THE PURPOSE OF DETERMINING WORST-CASE SCENARIOS.

FORMAT : ALPHANUMERIC
 LENGTH : 1.0
 SECURITY : NONE
 OWNERSHIP : COMPLIANCE
 MANDATORY : YES

| REPORT | UPDATE | BROWSE | CARD | | | |
|---------|--------|--------|------|------|-------|--------------|
| ACRONYM | SCREEN | SCREEN | TYPE | SEQ | COLS. | FILE |
| ----- | ----- | ----- | ---- | ---- | --- | ----- |
| SCAP | 303 | 503 | 13 | 1 | 24 | AIR PGM PLLT |

VALID VALUES ... :

(IN ORDER FROM WORST TO BEST CASE)

OUT OF COMPLIANCE

B - IN VIOLATION WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
 1 - IN VIOLATION - NO SCHEDULE
 6 - IN VIOLATION - NOT MEETING SCHEDULE
 W - IN VIOLATION WITH REGARD TO PROCEDURAL COMPLIANCE

STATE POLLUTANT COMPLIANCE STATUS (CONTINUED)

UNKNOWN COMPLIANCE

- Y - UNKNOWN WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
- 0 - UNKNOWN COMPLIANCE STATUS
- A - UNKNOWN WITH REGARD TO PROCEDURAL COMPLIANCE
- 7 - IN VIOLATION - UNKNOWN WITH REGARD TO SCHEDULE
- U - UNKNOWN BY EVALUATION CALCULATION (GENERATED VALUE-NOT AVAILABLE FOR INPUT)

ON SCHEDULE

- 5 - MEETING COMPLIANCE SCHEDULE

IN COMPLIANCE

- C - IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS
- 4 - IN COMPLIANCE BY OFF-SITE EVALUATION
- 3 - IN COMPLIANCE BY ON-SITE EVALUATION
- M - IN COMPLIANCE - CEMS
- 2 - IN COMPLIANCE - SOURCE TEST
- 8 - NO APPLICABLE STATE REGULATION
- 9 - IN COMPLIANCE - SHUT DOWN
- P - PRESENT, SEE OTHER PROGRAM(S)

STATE POLLUTANT COMPLIANCE STATUS DESCRIPTION

DATA ELEMENT NAME: STATE POLLUTANT COMPLIANCE STATUS DESCRIPTION

DESCRIPTION : A TWENTY-FIVE CHARACTER POLLUTANT COMPLIANCE STATUS
CODE DESCRIPTION.

FORMAT : ALPHANUMERIC
 LENGTH : 25.0
 SECURITY : NONE
 OWNERSHIP : COMPLIANCE
 MANDATORY : YES

| REPORT | UPDATE | BROWSE | CARD | | | | |
|---------|--------|--------|------|-----|-------|--------------|--|
| ACRONYM | SCREEN | SCREEN | TYPE | SEQ | COLS. | FILE | |
| ----- | ----- | ----- | ---- | --- | ----- | ----- | |
| SDAP | | 503 | | | | AIR PGM PLLT | |

VALID VALUES ... :

STATE POLLUTANT COMPLIANCE STATUS CODE DESCRIPTION IS GENERATED FOR VALID
VALUES ON THE AFS DESCRIPTION TABLE MAINTAINED WITHIN AFS IN THE AFS TABLE
FILE.

(IN ORDER FROM WORST TO BEST CASE)

OUT OF COMPLIANCE

B - IN VIOLATION WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
 1 - IN VIOLATION - NO SCHEDULE
 6 - IN VIOLATION - NOT MEETING SCHEDULE
 W - IN VIOLATION WITH REGARD TO PROCEDURAL COMPLIANCE

UNKNOWN COMPLIANCE

Y - UNKNOWN WITH REGARD TO BOTH EMISSIONS AND PROCEDURAL COMPLIANCE
 0 - UNKNOWN COMPLIANCE STATUS
 A - UNKNOWN WITH REGARD TO PROCEDURAL COMPLIANCE
 7 - IN VIOLATION - UNKNOWN WITH REGARD TO SCHEDULE
 U - UNKNOWN BY EVALUATION CALCULATION (GENERATED VALUE-NOT AVAILABLE FOR
INPUT)

STATE POLLUTANT COMPLIANCE STATUS DESCRIPTION (CONTINUED)

ON SCHEDULE

5 - MEETING COMPLIANCE SCHEDULE

IN COMPLIANCE

C - IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS
4 - IN COMPLIANCE BY OFF-SITE EVALUATION
3 - IN COMPLIANCE BY ON-SITE EVALUATION
M - IN COMPLIANCE - CEMS
2 - IN COMPLIANCE - SOURCE TEST
8 - NO APPLICABLE STATE REGULATION
9 - IN COMPLIANCE - SHUT DOWN
P - PRESENT, SEE OTHER PROGRAM(S)

APPENDIX C BATCH TRANSACTION LAYOUT

AFS PLANT CMS
TRANSACTION TYPE 18

| | <u>Name of Field</u> | <u>From</u> | <u>Thru</u> | <u>Column Length</u> | <u>Field Remarks</u> |
|----|-----------------------------|-------------|-------------|----------------------|----------------------|
| 1 | State Code | 1 | 2 | 2 | Key |
| 2 | County Code | 3 | 5 | 3 | Key |
| 3 | Plant ID | 6 | 10 | 5 | Key |
| 4 | Transaction Type | 11 | 12 | 2 | Key, Always 18 |
| 5 | Sequence Number | 13 | 13 | 1 | Key, Always 1 |
| 6 | Source Category | 14 | 14 | 1 | |
| 7 | Minimum Frequency Indicator | 15 | 15 | 1 | |
| 8 | Fiscal Year of FCE-Year A | 16 | 19 | 4 | |
| 9 | Onsite Visit-Indicator A | 20 | 20 | 1 | |
| 10 | Fiscal Year of FCE-Year B | 21 | 24 | 4 | |
| 11 | Onsite Visit-Indicator B | 25 | 25 | 1 | |
| 12 | Fiscal Year of FCE-Year C | 26 | 29 | 4 | |
| 13 | Onsite Visit-Indicator C | 30 | 30 | 1 | |
| 14 | Fiscal Year of FCE-Year D | 31 | 34 | 4 | |
| 15 | Onsite Visit-Indicator D | 35 | 35 | 1 | |
| 16 | Fiscal Year of FCE-Year E | 36 | 39 | 4 | |
| 17 | Onsite Visit-Indicator E | 40 | 40 | 1 | |
| 18 | Comment | 41 | 79 | 39 | |
| 19 | Update Code | 80 | 80 | 1 | Key, Always A or C |

APPENDIX D

ADDITIONAL AFS SCREENS

UPDATE PLANT INFORMATION MENU - SCREEN 040

| | | |
|--|----------------------------------|--------------|
| DATE : 05/17/01 | AIRS FACILITY SUBSYSTEM - UPDATE | PGM: AFP040 |
| SCREEN: 040 | PLANT INFORMATION | MAP: AFM0401 |
| ===== | | |
| | | |
| 1 GENERAL INFORMATION (300) | | |
| 2 POLLUTANT INFORMATION (301) | | |
| 3 AIR PROGRAMS (302) | | |
| 4 POLLUTANT AIR PROGRAMS (303) | | |
| 5 PERMIT ADMINISTRATION (060) | | |
| 6 MAILING LABEL INFORMATION (305) | | |
| 7 ACTIONS (306) | | |
| 8 COMMENTS (307) | | |
| 9 ASBESTOS INFORMATION (042) | | |
| 10 HIGH PRIORITY VIOLATOR UPDATE UTILITY (314) | | |
| 11 COMPLIANCE MONITORING STRATEGY (315) | | |
| | | |
| ENTER MENU SELECTION: ____ | | |
| | | |
| PF1=HELP PF3=END PF4=MAIN PF5=TERM PF10=SCRN PF12=BRWS | | SCREEN: ____ |

BROWSE PLANT INFORMATION MENU - SCREEN 050

| | | |
|--|----------------------------------|--------------|
| DATE : 05/17/01 | AIRS FACILITY SUBSYSTEM - BROWSE | PGM: AFP050 |
| SCREEN: 050 | PLANT INFORMATION | MAP: AFM0501 |
| ===== | | |
| | | |
| 1 GENERAL INFORMATION (500) | | |
| 2 POLLUTANT INFORMATION (501) | | |
| 3 AIR PROGRAMS (502) | | |
| 4 POLLUTANT AIR PROGRAMS (503) | | |
| 5 HISTORICAL COMPLIANCE INFORMATION (504) | | |
| 6 PERMIT ADMINISTRATION (080) | | |
| 7 MAILING LABEL INFORMATION (506) | | |
| 8 ACTIONS (507) | | |
| 9 COMMENTS (508) | | |
| 10 ASBESTOS INFORMATION (052) | | |
| 11 PLANT SUMMARY (509) | | |
| 12 HIGH PRIORITY VIOLATOR TRACKING (514) | | |
| 13 HPV FLAG ACTION PATHWAY MATRIX (515) | | |
| 14 COMPLIANCE MONITORING STRATEGY (516) | | |
| | | |
| ENTER MENU SELECTION: ____ | | |
| | | |
| PF1=HELP PF3=END PF4=MAIN PF5=TERM PF10=SCRN | | SCREEN: ____ |

UPDATE PLANT COMPLIANCE MONITORING STRATEGY - SCREEN 315

```
DATE   : 09/20/01      AIRS FACILITY SUBSYSTEM - UPDATE      PGM:  AFP315
SCREEN:  315           COMPLIANCE MONITORING STRATEGY        MAP:  AFM3151
=====
10000 TEST PLANT                      123 TEST DRIVE
-----
                                           ( 2001/09/17 - JH1 )

CMS SOURCE CATEGORY:  A

CMS MINIMUM FREQUENCY INDICATOR:  6

PLANNED YEAR(S) OF FULL COMPLIANCE EVALUATION (FCE):
  FISCAL YEAR A:  _____  ON-SITE VISIT PLANNED (Y/N):  _
  FISCAL YEAR B:  2011      ON-SITE VISIT PLANNED (Y/N):  Y
  FISCAL YEAR C:  2012      ON-SITE VISIT PLANNED (Y/N):  N
  FISCAL YEAR D:  2015      ON-SITE VISIT PLANNED (Y/N):  Y
  FISCAL YEAR E:  2020      ON-SITE VISIT PLANNED (Y/N):  N

COMMENT:  ROBS TEST COMMENT_____

PF1=HELP PF3=END PF4=MAIN PF5=TERM PF10=SCRN                      SCREEN:  ____
```

APPENDIX E

Minimum Data Requirements for Clean Air Act Stationary Source Compliance

Matrix of National Minimum Data Requirements (MDRs)
for
Clean Air Act Stationary Source Compliance

New reporting in AFS data fields or data reporting are identified by italics

| National Minimum Data Requirements (MDRs) Clean Air Act Stationary Source Compliance Program | Implementation in AFS | Modifications to Data Management Reporting Guidance | AFS Responsible Agency |
|--|--|--|---|
| Data Covered by Current 1998 ICR | | | |
| <u>Identification Data</u> - 1. Facility Name, 2. Facility State, 3. Facility County, 4. Facility ID Number, 5. Facility Street Address, 6. Facility City, 7. Facility Zip Code, 8. SIC Code, 9. Government Ownership Indicator, 10. Current Significant Violator Status ¹ <u>Regulated Air Program(s)</u> - 11. Plant Air Program(s), 12. Plant Air Program Operating Status <u>Regulated Pollutant(s) Within an Air Program</u> - 13. Pollutant Type, 14. Classification, 15. Attainment Status, 16. Compliance Status <u>Minimum Reportable Actions Within Air Programs</u> - 17. Action Number, 18. Action Type, 19. Date Achieved <u>20. Minimum Reportable Action Types</u> - Inspections, Stack Tests ² , Notices of Violation, Administrative Orders (with penalty amounts), Civil Referrals * (with penalty amounts), Criminal Referrals*, Day Zero <u>Minimum Reportable Actions Within Air Programs</u> - 21. All actions in HPV pathway from 'Initiating' through 'Addressing' and associated dates | 1. Update MDRs | None | State/locals, EPA Regions |
| HPV Data Not Covered by 1998 ICR | | | |
| <u>HPV Actions</u> 22. HPV 'Resolving' and/or close-out actions and associated dates 23. Link all actions in sequence by use of AFS 'Day Zero' action linking ³ | 1. Update facility High Priority Violation (HPV) ¹ designations by updating all applicable underlying action data | 1. Simplified and accurate tracking of HPV information ⁴ | EPA Regions ³ States/locals- Data Source ³ |
| <u>Plant HPV Record</u> - 24. HPV ¹ Status field and associated effective date field (eliminates Item 10 above) | 1. Add Plant HPV record type to AFS 2. Generate the HPV status and update Effective Date field | 1. Elimination of Significant Violator SVII 'flag' update reporting ⁴ | System generated |

Continued
Matrix of National Minimum Data Requirements (MDRs)
for
Clean Air Act Stationary Source Compliance

New reporting in AFS data fields or data reporting are identified by italics

| National Minimum Data Requirements (MDRs) Clean Air Act Stationary Source Compliance Program | Implementation in AFS | Modifications to Data Management Reporting Guidance | AFS Responsible Agency |
|--|--|---|---|
| CMS Data Not Covered by 1998 ICR | | | |
| <u>Plant Compliance Monitoring Strategy (CMS) Record -</u> 25. CMS Source Category field 26. Minimum Frequency (MF) Indicator field* | 1. New AFS record type- Plant Compliance Monitoring Strategy 2. Add 1-character CMS Source Category Field (CMSC) 3. Add valid values for CMSC to indicate Title V, Mega-Site or SM source => 80% of Title V PTE threshold 4. Add 1 character-numeric MF Indicator field (CMSI) 5. Support valid values 1-9 | 1. Greater speciation of Title V and Synthetic Minor sources by indicating Mega-Sites and SM source => 80% of Major PTE threshold 2. Identification of Full Compliance Evaluation (FCE) determination frequency period for facility | Items 25 and 26: Only EPA may update these fields; State/locals provide data input via CMS plans |
| <u>Annual CMS Plan</u> 27. FCE Fiscal Year fields: (CMYA-CMYE)* 28. FCE On-Site Visit Indicator fields: (CMOA-CMOE)* | 1. Add five, 4-character numeric fields (CMYA, CMYB, CMYC, CMYD, CMYE) for tracking of planned FCE fiscal year. 2. Update annual date values beginning 2002 3. Add five, 1-character alphanumeric fields (CMOA, CMOB, CMOC, CMOD, CMOE) associated with FCE Fiscal Year field 4. Update CMOA-CMOE with 'Y' (yes-on site) or 'N' (no-off site); the default value for the field will be 'Y' | 1. Assessment of FY compliance evaluation and on- site visit field data used to support revised CMS | Items 27 and 28: CMS plan submitted by States/Locals to EPA with optional reporting to AFS |
| <u>Annual CMS Plan</u> 29. Identify facilities without a timely FCE | 1. Develop AFS utility that reads MF Indicator field, current date and EPA/State Date of Last FCE. Plants with FCE and date achieved that falls outside the MF period will have their Federal Compliance Status Code changed to 'Unknown By Evaluation Calculation' 2. Develop utility that removes previously generated 'Unknown By Evaluation Calculation' value when new FCE updated to plant | 1. Identification of facilities without timely FCE 2. Automated update of facility status upon completion of FCE | AFS Generated |

Continued
Matrix of National Minimum Data Requirements (MDRs)
for
Clean Air Act Stationary Source Compliance

New reporting in AFS data fields or data reporting are identified by italics

| National Minimum Data Requirements (MDRs) Clean Air Act Stationary Source Compliance Program | Implementation in AFS | Modifications to Data Management Reporting Guidance | AFS Responsible Agency |
|---|--|--|-----------------------------------|
| CMS Data Not Covered by 1998 ICR | | | |
| <u><i>Actions Within Air Programs -</i></u> <i>30. Report all Full Compliance Evaluations (FCE)</i> | <i>1. Add State and National action types to action tables, including FCE with on-site visit and FCE without on-site visit</i> <i>2. Update all FCE actions in Plant level action record</i> <i>Examples of FCE action types are provided in Table I to this matrix</i> | <i>1. Reporting of evaluation activities replaces Level 2 inspection reporting</i> | <i>State/locals, EPA Regions</i> |
| <u><i>Actions Within Air Programs -</i></u> <i>31. Report all Partial Compliance Evaluations (PCE)</i> | <i>1. Add Regional and National action types to action tables, including PCE</i> <i>2. Update all PCE actions in Plant level action record; including PCEs, Stack Tests and Title V Annual Compliance Certification Reviews</i> <i>Examples of PCE action types are provided in Table I to this matrix</i> | <i>1. Optional reporting of all evaluation activities</i> | <i>State/locals, EPA Regions</i> |
| <u><i>Actions Within Air Programs -</i></u> <i>32. Report all Investigations</i> | <i>1. Add Regional and National action types to action tables for Investigations</i> <i>2. Investigations (Investigation Initiated*, Investigation Completed)</i> | <i>1. New reporting of all Investigation activities</i> | <i>State/locals, EPA Regions</i> |
| <u><i>Actions Within Air Programs-</i></u> <i>33. Report performance of all stack tests</i> | <i>1. Update Results Code for all stack tests reported</i> <i>2. Update action pollutant code for all stack tests</i> <i>3. Update pollutant compliance status as appropriate</i> <i>Examples of Stack Test action types are provided in Table I to this matrix</i> | <i>1. Reporting of Results (Pass/Fail) for all stack tests</i> <i>2. Optional reporting of Action Pollutant data related to stack tests conducted</i> | <i>State/locals, EPA Regions</i> |
| <u><i>Actions Within Air Programs -Title V Annual Compliance Certifications</i></u> <i>34. State Review Date</i> | <i>1. Report agency reviews of Annual Compliance Certifications, including Date Achieved</i> | <i>1. Reporting of annual compliance certifications reviews</i> | <i>State/locals</i> |

Continued
Matrix of National Minimum Data Requirements (MDRs)
for
Clean Air Act Stationary Source Compliance

New reporting in AFS data fields or data reporting are identified by italics

| National Minimum Data Requirements (MDRs) Clean Air Act Stationary Source Compliance Program | Implementation in AFS | Modifications to Data Management Reporting Guidance | AFS Responsible Agency |
|---|---|---|---|
| CMS Data Not Covered by Current 1998 ICR | | | |
| <i>Actions Within Air Programs - Title V Annual Compliance Certifications</i> 35. <i>State Results of Certification Review</i> | 1. Update these actions with Results Code. Valid values are: 'In Violation', 'In Compliance' and 'Unknown' | 1. Reporting of annual compliance certifications review results | State/locals |
| <i>Actions Within Air Programs - Title V Annual Compliance Certifications</i> 36. <i>Due Date</i> | 1. Update actions with Action Type 'Title V Annual Compliance Certification Received' with associated Date Scheduled (for 'Due Date') | 1. Reporting of annual compliance certification due dates to AFS | EPA Regions Optional for States Option for System Generation ⁵ |
| <i>Actions Within Air Programs - Title V Annual Compliance Certifications</i> 37. <i>EPA Received Date</i> | 1. Update actions with Action Type 'Title V Annual Compliance Certification Received' with associated Date Achieved (for 'Received Date') | 1. Reporting of annual compliance certifications | EPA Regions |
| <i>Actions Within Air Programs - Title V Annual Compliance Certifications</i> 38. <i>EPA Reviewed Date</i> | 1. Update actions with Action Type 'Title V Annual Compliance Certification Reviewed' with Date Achieved | 1. Reporting to AFS of EPA review of Title V Annual Compliance Certifications | EPA Regions |
| <i>Actions Within Air Programs - Title V Annual Compliance Certifications</i> 39. <i>EPA Results of Certification Review</i> | 1. Update the 'Title V Annual Compliance Certification Reviewed' actions with Results Code. Valid values are: 'In Violation', 'In Compliance' and 'Unknown' | 1. Reporting of annual compliance certifications review results | EPA Regions |
| <i>Actions Within Air Programs - Title V Annual Compliance Certifications</i> 40. <i>Deviations Identified by Facility</i> | 1. Update RD81 field on 'Title V Annual Compliance Certification Reviewed' actions with 'Deviation Value' of 'Y'(yes) or 'N'(no) | 1. Use of RD81 as data field for recording 'Deviation value' | EPA Regions |

Endnotes:

* Indicates Enforcement Sensitive

1. The use of the 'Significant Violator' (SV) flag and three historic SV flag value fields on the AFS Plant General Record were eliminated in October, 1999. The SV flag was replaced by the use of the HPV field, located on the Plant HPV record. Automated updating of the HPV flag from underlying linked AFS action data commenced in January 2001.

2. See Item 33.

3. The lead agency is responsible for reporting their own actions; action linking within AFS is optional for States and mandatory for EPA via information provided by States pursuant to High Priority Violation (HPV) policy.

4. See "Simplified and Accurate Tracking of High Priority Violation (HPV) Information in AFS," June 2, 2000

5. Globally calculated from Permit Issuance Date by HQ, or from other criteria as specified by Regions.

Table I
Example State Only Action Types for CMS

| Nat'l (ANT1) | National Description |
|---------------------|---|
| ----- | Full Compliance Evaluations (FCE) |
| FS (new) | State Conducted Full Compliance Evaluation (FCE) / On-site |
| FF (new) | State Conducted Full Compliance Evaluation (FCE) / Off-site |
| ----- | Investigations |
| SI (new) | State Investigation Initiated ³ |
| SC (new) | State Investigation Conducted |
| | Title V Annual Compliance Certifications |
| SR (existing) | Annual Compliance Certification State Review |
| CB (new) | Title V Annual Compliance Certification Due/Received by State |
| ----- | Stack Tests |
| 3A (existing) | State Req'd (Owner/Oper. Conducted) Stack Test Observed & Reviewed |
| TR (new) | State Req'd (Owner/Oper. Conducted) Stack Test Not Observed, but Reviewed |
| 6C (existing) | State Conducted Stack Test |
| ----- | Partial Compliance Evaluations (PCE) ON-SITE ⁴ |
| PS (new) | State Partial Compliance Evaluation (PCE) / On-site |
| ----- | Partial Compliance Evaluations (PCE) OFF-SITE ⁵ |
| PX (new) | State Partial Compliance Evaluation (PCE) / Off-Site |

³ State Investigation Initiated is added for optional use and is enforcement sensitive.

⁴ Examples of State PCE's with an on-site visit could include: State Visible Emission (VE) Observation (Method 9); State Complaint Inspection; State Case Development Inspection; State Leak Detection Test (LDAR); State Sample(s) Taken; State Conducted Continuous Monitoring System QA Audit; Source Conducted Continuous Monitoring System QA, Observed & Reviewed by State (60.13, App F)

⁵ Examples of State PCE's without an on-site visit could include: Source Conducted Continuous Monitoring System QA, Not Observed, Reviewed by State (60.13, APP F); Source Conducted Continuous Monitoring System QA, Not Observed, Not Reviewed by State (60.13, App F); State Review of Qtrly EER; State Review of Semi-annual Deviation Report (SDR); State Review of Sample Test Results; State Review of Facility Response to Information Request

Table I
Example EPA Only Action Types for CMS

| Nat'l (ANT1) | National Description |
|---------------------|---|
| ----- | Full Compliance Evaluations (FCE) |
| FE (new) | EPA Conducted Full Compliance Evaluation (FCE) / On-site |
| FZ (new) | EPA Conducted Full Compliance Evaluation (FCE) / Off-site |
| ----- | Investigations |
| EI (new) | EPA Investigation Initiated ⁶ |
| EC (new) | EPA Investigation Conducted |
| | Title V Annual Compliance Certifications |
| ER (existing) | Annual Compliance Certification EPA Review |
| CC (new) | Title V Annual Compliance Certification Due/Received by EPA |
| ----- | Stack Tests |
| TO(new) | EPA Req'd (Owner/Oper. Conducted) Stack Test Observed & Reviewed |
| TE (new) | EPA Req'd (Owner/Oper. Conducted) Stack Test Not Observed, but Reviewed |
| 2A (existing) | EPA Conducted Stack Test |
| ----- | Partial Compliance Evaluations (PCE) ON-SITE ⁷ |
| ES (new) | EPA Partial Compliance Evaluation (PCE) / On-site |
| | Partial Compliance Evaluations (PCE) OFF-SITE ⁸ |
| EX (new) | EPA Partial Compliance Evaluation (PCE) / Off-Site |

⁶ EPA Investigation Initiated is added for optional use and is enforcement sensitive.

⁷ Examples of EPA PCE's with an on-site visit could include: EPA Visible Emission (VE) Observation (Method 9); EPA Complaint Inspection; EPA Case Development Inspection; EPA Leak Detection Test (LDAR); EPA Sample(s) Taken; EPA Conducted Continuous Monitoring System QA Audit; Source Conducted Continuous Monitoring System QA, Observed & Reviewed by EPA (60.13, App F)

⁸ Examples of EPA PCE's without an on-site visit could include: Source Conducted Continuous Monitoring System QA, Not Observed, Is Reviewed by EPA (60.13, APP F); Source Conducted Continuous Monitoring System QA, Not Observed, Not Reviewed by EPA (60.13, App F); EPA Review of Qtrly EER; EPA Review of Semi-annual Deviation Report (SDR); EPA Review of Sample Test Results; EPA Review of Facility Response to Information Request

TABLE II

SUMMARY OF NATIONAL MINIMUM DATA REQUIREMENTS (MDR'S)
FOR CLEAN AIR ACT STATIONARY SOURCE COMPLIANCE

MARCH 2002

Unless otherwise noted, both Regions and States/Locals report their data

| <u>Identification</u> | <u>Covered by 1998 ICR</u> |
|---|-----------------------------------|
| 1. Facility Name | Yes |
| 2. State | Yes |
| 3. County | Yes |
| 4. Facility Number | Yes |
| 5. Street | Yes |
| 6. City | Yes |
| 7. Zip Code | Yes |
| 8. SIC Code | Yes |
| 9. Government Ownership | Yes |
| 10. HPV Status (replaces SV status) | Yes ¹ |
| <u>Compliance Monitoring Strategy</u> | |
| 11. CMS Source Category ² | No |
| 12. CMS Minimum Frequency Indicator ² | No |
| <u>Regulated Air Program(s)</u> | |
| 13. Air Program | Yes |
| 14. Operating Status | Yes |
| <u>Regulated Pollutant(s) within Air Program(s)</u> | |
| 15. Pollutant(s) | Yes |
| 16. Classification(s) | Yes |
| 17. Attainment Status | Yes |
| 18. Compliance Status | Yes |
| <u>Actions Within Air Programs</u> ³ | |
| 19. Minimum Reportable Actions are: | |
| Notice of Violation(s) | Yes |
| Administrative Order(s) and penalty amounts | Yes |
| (Includes Enforcement Orders, Consent Decrees and Consent Agreements) | |
| Civil Referrals and penalties | Yes |
| Day Zero | Yes |
| Addressing actions ⁴ | Yes |
| Resolving actions ⁵ | Yes |
| Full Compliance Evaluations (replaces Inspection actions) | Yes ⁶ |
| Stack Tests | Yes ⁷ |
| Title V Annual Compliance Certification Received ^{8,13} | No |
| Title V Annual Compliance Certification Reviewed ^{9,10} | No |
| Investigations ¹¹ | No |
| <u>Additional action information:</u> | |
| 20. Key Action ¹² | No |
| 21. Results Code ^{7,10} | No |
| 22. RD81 (Certification Deviations) ^{8,9} | No |
| 23. Date Scheduled ¹³ | No |

Endnotes:

1. Significant violator status (SV) is an obsolete field. It was replaced by the High Priority Violation (HPV) status in June 2000 with the implementation of the HPV tracking program. Modifications to AFS to support this program were put into production during January 2001. HPV status is system generated.
2. EPA entry into AFS; States/Locals provide information (or negotiate with EPA region for data entry rights).
3. Includes action number, action type, and date achieved. Penalty amount is also included where appropriate.
4. Examples of addressing actions include, but are not limited to: State/EPA Civil Action; Source returned to compliance by State/EPA with no further action required; State/EPA Administrative Order; State/EPA Consent Decree .
5. Examples of resolving actions include Violation Resolved by State/EPA; State/EPA Closeout Memo Issued; Section 113(d) Penalty Collected; Section 113(d) Complaint Withdrawn. HPV lead agency responsible for data entry of actions into AFS.
6. Inspection reporting is now replaced by Full Compliance Evaluations per the revised CMS policy.
7. Data fields reported for stack tests will now include Results code (pass/fail). Please note that an optional action pollutant field is available to report stack tests by pollutant.
8. EPA reports and enters into AFS unless otherwise negotiated.
9. Annual Compliance Certification deviation(s) will be indicated in RD81 for EPA reviews.
10. Result codes for Annual Compliance Certification reviews are: in compliance, in violation and unknown.
11. State/EPA Investigation Initiated and State/EPA Investigation Conducted. State/EPA Investigation Initiated is added for optional use and is enforcement sensitive.
12. The key action field (a Y/N field) used on a Day Zero action type will initiate a violation pathway. Violation pathways are one form of action linking and are required for the HPV tracking program. Data entry can be negotiated with State/Local agencies as they report their HPV information.
13. The Due date of a Title V Annual Compliance Certification will be reported as a date scheduled on the "Title V Annual Compliance Certification Due/Received by EPA" action.